

# EXHIBIT A

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12 *CREDIT PAYMENT SERVICES, INC.*

13 **IN THE UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 FLEMMING KRISTENSEN, individually,  
16 and on behalf of a class of similarly situated  
17 individuals,

Plaintiff,

17 v.

18 CREDIT PAYMENT SERVICES, INC.,  
a Nevada corporation,  
19 f/k/a MYCASHNOW.COM INC.,  
ENOVA INTERNATIONAL, INC.,  
20 an Illinois corporation,  
PIONEER FINANCIAL SERVICES, INC.,  
21 a Missouri corporation,  
LEADPILE LLC,  
22 a Delaware limited liability company, and  
CLICKMEDIA, LLC d/b/a NET1PROMOTIONS  
23 LLC, a Georgia limited liability company,

24 Defendants.

) Case No. 2:12-CV-00528-APG (PAL)  
)  
) **DECLARATION MICHELE R. HALL**  
) **IN SUPPORT OF CREDIT**  
) **PAYMENT SERVICES, INC.'S**  
) **RESPONSE TO THIS COURT'S**  
) **ORDER (DKT 272) GRANTING IN**  
) **PART, AND DENYING IN PART,**  
) **PLAINTIFF'S MOTION TO**  
) **COMPEL DEFENDANT CREDIT**  
) **PAYMENT SERVICES, INC. (DKT**  
) **199)**

1 I, Michele R. Hall, hereby aver pursuant to 28 U.S.C. § 1746, that I have personal  
2 knowledge of all matters set forth herein unless otherwise indicated, and would testify thereto if  
3 called as a witness in this matter.

4 1. I am an adult over the age of 18 years of age and am a resident of the State of  
5 Missouri. I am a paralegal with Dentons US LLP. I work with the attorneys Gregory T. Wolf  
6 (“Wolf”) and Steven M. Aaron (“Aaron”) who represent Defendant Credit Payment Services, Inc.  
7 (“CPS”) in this matter and who are admitted *Pro Hac Vice* before this Court. I have worked  
8 extensively on discovery matters in this case, including but not limited to, investigating and  
9 managing document collections and document productions, as well as work on all additional  
10 supplemental document productions. I am fully competent to make this Declaration, and make it  
in support of CPS’ Response to Court Order, Docket 272.

11 2. On or about November 1, 2013, Dentons US LLP (“Dentons”) was retained as  
12 counsel for CPS, replacing Timothy Walton of Walton TWU LLP (“Walton”) and David Hutton  
13 (“Hutton”) with Scenic City Legal Group (“SCLG”). (*See* Entry of Appearance (Dkt. 115), and  
14 Notice of Withdrawal (Dkt. 116), filed November 1 and 4, 2013).

15 3. Shortly after the instant lawsuit was filed, Hutton advised CPS to retain all  
16 documents and electronic information potentially relevant to this suit (*see* ¶ 4, Declaration of  
17 David Hutton, dated May 15, 2014 (inadvertently dated May 15, 2015) (“Hutton Decl.”), attached  
to this declaration as Exhibit 1.

18 4. On January 26, 2012, CPS issued a Litigation Hold directed to “All CPS Staff”, via  
19 email, marked with high importance, and with the subject “URGENT: Your immediate attention  
20 and action required.” (“CPS Litigation Hold.”) The CPS Litigation Hold directed all CPS  
21 employees to “cease deleting any CPS-related data indefinitely. If there is a need to delete data  
22 (i.e. for space purposes, etc.) please preserve the data in some form prior to deletion...”. The CPS  
23 Litigation Hold included names of persons to contact if employees had questions, and contained  
24 extensive directions, definitions, directives and information regarding the litigation hold. Pursuant  
25 to the CPS Litigation Hold, CPS’ routine document retention policies were suspended regarding  
26

1 “all documents and data during the Legal Hold.” The time frame for the CPS Litigation Hold, as  
 2 noted in the hold notice is “01/2001 - present and indefinitely.”

3 5. On July 30, 2013, and prior to Dentons Entry of Appearance, Plaintiff filed a  
 4 Motion to Compel document production from Defendant CPS (Dkt. 95). The Court entered a  
 5 minute order as to the hearing held on the matter August 27, 2013 (Dkt. 104), in which CPS was  
 6 ordered to use the specified search terms as set forth in Dkt. 95 (the “Specified Search Terms”) as  
 follows:

7 SMS  
 8 “text message\*”  
 LeadPile  
 9 Net1promotions  
 net1  
 10 Click Media  
 Clickmedia  
 11 TCPA  
 text message spam  
 12 text spam  
 ATDS  
 13 autodial\*  
 A203LeadGen@area203.com  
 14 (text\* OR sms) w/10 (blast\* OR messag\* OR automat\* OR market\* OR  
 campaign\*)  
 15 ((text\* OR sms) AND message\*) w/5 (policy OR approv\* OR legal OR advertis\*)  
 16 And communications between [CPS] and Area203 Marketing discussing text  
 message lead generation marketing

17 6. After Dentons took over as counsel for CPS, we requested Walton provide the data  
 18 collected from CPS, pursuant to the minute order (Dkt. 104), or otherwise, as well as any  
 19 document productions made. On November 22, 2013, Walton electronically transmitted all the  
 20 native documents that had been collected and those documents which were produced on behalf of  
 21 CPS in the case.

22 7. I spoke with Walton by telephone on December 12, 2013 (12/12/13 Walton  
 23 Conversation”) to further investigate and determine the status of CPS’ document collection and  
 24 document production efforts. I was informed by Walton that prior to Dentons’ engagement as  
 25 counsel for CPS, Walton made three document productions on behalf of CPS:  
 26

1           a)     On September 10, 2013, a document production was made, producing  
2 emails, documents and attachments in native without bates numbers, from documents  
3 collected from custodians Lisa Dake and Sharon Roberson.

4           b)     On September 25, 2013, a second document production was made,  
5 producing emails, documents and attachments in native without bates numbers, from  
6 documents collected from custodians Andrew Moore, Elayne Gordy, John Ballantyne,  
7 Keith Goldman, and Liane Shifflett.

8           c)     On October 31, 2013, a third final native document production was made,  
9 producing emails, documents and attachments in native without bates numbers, from  
10 documents collected from custodians Liane Shifflett, Ben Underwood and Matthew  
11 Williams.

12 (The September 10, 2013, September 25, 2013 and October 31, 2013 CPS productions by Walton  
13 are hereinafter referred to as the "Walton Prior Productions")

14           8.     During the 12/12/13 Walton Conversation, and in later communications with  
15 Hutton, Dentons determined Walton worked with Hutton and representatives at CPS, working  
16 primarily with Viola Elayne Gordy, former CPS Compliance Director ("Gordy"), to conduct the  
17 document collection (*see* Ex. 1, Hutton Decl. ¶¶ 6, 7, as well as an April 24, 2014 telephone  
18 conversation between Aaron and Gordy, memorialized by privileged memorandum by Aaron  
19 dated April 24, 2014 ("4/24/14 Gordy Conversation"). Hutton, along with Walton advised and  
20 guided CPS, and CPS, including its IT department, applied the Specified Search Terms to all CPS  
21 computers and the CPS network to gather potentially relevant Electronically Stored Information  
22 ("ESI"). (12/12/13 Walton Conversation, Ex. 1, Hutton Decl., ¶ 6, 4/24/14 Gordy Conversation).  
23 Potentially relevant documents were found from the following custodians:

24           Dake, Lisa  
25           Fletcher, Garry  
26           Ginoza, Justin  
            Gordy, Elayne  
            Joly, Stacy  
            McCord, Chris  
            Moore, Andrew

O'Connor, Michael  
 Roberson, Sharon  
 Shiflett, Liane  
 Underwood, Ben  
 Walia, Micky  
 Williams, Matthew

9. In addition to conducting ESI searches, Gordy reached out to individuals at CPS who might have potentially relevant information in order to conduct a thorough, diligent document collection for potentially relevant documents. (4/24/14 Gordy Conversation).

10. The 12/12/13 Walton Conversation, along with the later communications with Hutton, and the 4/24/14 Gordy Conversation, confirmed that the potentially responsive documents from the custodians listed in paragraph 7 above, which resulted from CPS applying the Specified Search Terms across the CPS computers, were delivered to Walton. (12/12/13 Walton Conversation, Ex. 1, Hutton Decl., ¶ 6, 4/24/14 Gordy Conversation).

11. At the time Dentons took over as counsel for CPS, there were 7,221 emails and attachments (this count results after attachments were extracted from mails), which comprised the Walton Prior Productions. Additionally, there were 9,883 emails and extracted attachments which had not yet been reviewed or produced by Walton.

12. During the course of discovery, CPS has produced 5,789 documents consisting of 30,216 pages. Following is detailed information pertaining to document productions made by CPS:

Date Produced	Beginning Bates No	Ending Bates No	Pgs	Docs	Description of Production
09/10/2013					Walton Prior Production, with documents from custodians Lisa Dake and Sharon Roberson ( <i>No identifying bates numbers, no redactions for privilege or confidential consumer information, no confidentiality designations made</i> )
09/25/2013					Walton Prior Production custodians Andrew Moore, Elayne Gordy, John Ballantyne, Keith Goldman, Susan Shiflett

Date Produced	Beginning Bates No	Ending Bates No	Pgs	Docs	Description of Production
10/31/2013					Walton Prior Production from custodians Liane Shifflett, Underwood, Williams (No identifying bates numbers, no redactions for privilege or confidential consumer information, no confidentiality designations made)
12/30/2013	CPS00000001	CPS00000484	484	92	Vol. CPS001 (documents not previously produced)
12/31/2013	CPS00000485	CPS00000838	354	120	Vol. CPS002 (documents not previously produced)
01/02/2014	CPS00000839	CPS00000949	111	46	Vol. CPS003 (documents not previously produced)
01/03/2014	CPS00000950	CPS00001343	394	141	Vol. CPS004 (documents not previously produced)
01/06/2014	CPS00001344	CPS00002102	759	256	Vol. CPS005 (documents not previously produced)
01/07/2014	CPS00002103	CPS00003214	1112	168	Vol. CPS006 (documents not previously produced)
01/08/2014	CPS00003215	CPS00003350	136	56	Vol. CPS007 (documents not previously produced)
01/09/2014	CPS00003351	CPS00003734	384	97	Vol. CPS008 (documents not previously produced)
		<b>TOTAL</b>	<b>3734</b>	<b>976</b>	
03/29/2014	CPS00003735	CPS00006931	3197	490	Vol. CPS009 (reproduction of Walton Prior Productions)
03/29/2014	CPS00006932	CPS000029654	22723	3883	Vol. CPS010 (reproduction of Walton Prior Productions)
12/05/2014	CPS000029655	CPS000030216	562	440	Vol. CPS011 (Additional ESI production) Vol. CPS012 (Additional paper files)
		<b>TOTAL</b>	<b>26482</b>	<b>4813</b>	
<b>GRAND TOTAL PRODUCED</b>			<b>30216</b>	<b>5789</b>	

13. During the 12/12/13 Walton Conversation, Walton explained he reviewed the documents only to determine whether they should be fully withheld for privilege. He did not review them for responsiveness, or confidentiality considerations. Mr. Walton withheld from

1 production emails he deemed fully privileged, and produced a privilege log with each production  
2 delivery. He produced all other documents not otherwise withheld for privilege in native format.

3 14. Because Walton produced in native format, there was no opportunity to give the  
4 documents identifiers (bates numbers), nor was there consideration given for confidentiality  
5 designations, or for partially privileged documents that otherwise would have been produced,  
6 redacting privileged information, or for documents which otherwise would have been produced,  
7 redacting confidential, third party consumer information.

8 15. A cursory look through the Walton Prior Productions by Dentons revealed there  
9 was a large amount of spam, personal, and other wholly non-responsive emails and documents.  
10 Dentons confirmed there were documents that should have been partially redacted for privilege or  
11 confidential, third party consumer information. Dentons also confirmed there were fully privileged  
12 documents, including documents containing legal advice concerning this particular lawsuit, which  
13 had been produced in the Walton Prior Productions. When Dentons reviewed and re-produced the  
14 Walton Prior Productions, there were found to be:

15 (a) 455 fully privileged documents that had been produced in the Walton Prior  
16 Production, which we clawed back pursuant to the Protective Order entered in this case,  
17 many of which were non-responsive and/or outside the agreed date range;

18 (b) 108 partially privileged documents that had been produced in the Walton  
19 Prior Production without redactions, which we reproduced, redacting privileged  
20 information which were also clawed back pursuant to the Protective Order entered in this  
21 case. Many of these documents were also non-responsive and/or outside the date range;

22 (c) 726 "Confidential" documents that had been produced in the Walton Prior  
23 Production without any confidentiality designations or redactions, which were clawed back  
24 pursuant to the Protective Order in this case, and re-produced imprinted with the  
25 appropriate confidentiality designations, and/or with redactions for confidential, third-party  
26 consumer information. Many of these documents were also non-responsive and/or outside  
the date range;



1 (d) 704 highly confidential “AEO” documents that had been produced in the  
2 Walton Prior Production without any confidentiality designations or redactions, which  
3 were clawed back pursuant to the Protective Order in this case, and re-produced imprinted  
4 with the appropriate confidentiality designations, and/or with redactions for confidential,  
5 third-party consumer information. Many of these documents were also non-responsive  
6 and/or outside the date range.

7 16. Because of the issues identified in paragraph 15 above, Dentons determined it  
8 necessary to re-review the Walton Prior Productions on behalf of CPS, reproduce the documents  
9 with bates number identifiers, with appropriate confidentiality designations where applicable, and  
10 with redactions for privileged or confidential, third party consumer information. Although there  
11 was a very high percentage of wholly non-responsive documents, including spam, personal emails,  
12 because Mr. Walton had previously produced these documents, Dentons re-produced every  
13 document, withholding only documents deemed privileged which should not have been produced  
14 in Walton’s Prior Productions in the first place.

15 17. Dentons made the reproductions of the Walton Prior Productions on March 29,  
16 2014. With the production, Dentons presented a Claw-Back letter, requesting all counsel destroy  
17 the Walton Prior Productions and accept the replacement productions with proper bates number  
18 identifiers, redactions and confidentiality designations.

19 18. Any of the documents referred to in paragraphs 15 (a) through (d) above which  
20 were determined to be fully or partially privileged, or which were redacted in any way were  
21 properly logged on CPS’ detailed Privilege Log and Log of Redactions on behalf of CPS served  
22 on Plaintiff May 28, 2014 (the “5/28/14 CPS Privilege Log”), attached as Exhibit 2 hereto.

23 19. During the course of Dentons’ review of documents to finish CPS’ document  
24 production, Dentons also discovered documents which should be designated as  
25 “CONFIDENTIAL” pursuant to the terms of the protective order entered in this case January 11,  
26 2013 (Dkt. 32). Dentons also discovered, and confirmed after consulting with CPS, there were  
documents that should be designated as “AEO”, a higher level of confidentiality that did not yet

1 exist in the January 11, 2013 protective order (Dkt. 32) entered in this case at that time. CPS  
2 drafted and circulated an Amended Protective Order to build in this additional layer of protection.  
3 The Amended Protective Order was entered by the Court January 30, 2014 (Dkt. 145).

4 20. April 30, 2014 CPS responded to Plaintiff's Second Interrogatories and Second  
5 Request for Production of Documents, and First Request for Admissions (the "April, 2014 CPS  
6 Discovery Responses").

7 21. CPS has always endeavored to respond to discovery requests to the best of its  
8 knowledge, information and belief. Prior to and during this time frame, CPS essentially stopped  
9 functioning as a viable company and began winding down its operations. As a result, several of  
10 the employees were let go. Despite this, efforts were made by Dentons and the few remaining  
11 employees of CPS to contact those employees let go in order to complete the discovery requests  
12 by Plaintiff and to obtain relevant documents. Contact was made with Doug Freeman  
13 ("Freeman"), who no longer works at CPS, but is the former President of CPS.

14 22. At the time CPS was winding down and letting employees go, all employees' hard  
15 drives were imaged, and the hard copy documents belonging to Elayne Gordy, the only employee  
16 believed to have kept paper files, were maintained in her personal office. *See* ¶ 34.

17 23. In April, 2014 while were working on responses to the discovery requests with  
18 Freeman and with the few CPS employees left, Aaron with Dentons contacted Elayne Gordy,  
19 former CPS employee and Compliance Officer. In Dentons' prior investigation into who assisted  
20 Walton with document collection, it was determined Gordy was the main person at CPS who  
21 assisted with reaching out to all the employees to determine what documents CPS had.  
22 Additionally, Gordy was one of the most critical custodians for the collection, because as  
23 Compliance Officer, she would have had the most involvement with matters related to the subject  
24 matter of the lawsuit.

25 24. As mentioned in paragraph 8 above, on April 24, 2014, Gordy and Aaron spoke at  
26 length. During that conversation, Aaron went through the discovery requests to get as much input  
and answers from Gordy as she could offer. In addition to that, Aaron spoke with her about the

1 document collection and the lawsuit to confirm the Specified Search Terms were run, and CPS  
2 employees were consulted as to whether they had potentially responsive documents. Ms. Gordy  
3 confirmed what Dentons had learned during prior investigations into the document collection,  
4 including during the 12/12/13 Walton Conversation, and discussions with Hutton (*see* Hutton  
5 Decl., ¶¶ 5, 6, 7.)

6 25. On April 24, 2014, Aaron also drafted a list of detailed questions to pose to CPS to  
7 assist with responding to the April, 2014 discovery, seeking answers and clarification as to CPS  
8 and industry terminology, CPS policies and procedures, and as well as listing and detailing  
9 documents CPS should conduct additional searches for, which would be potentially responsive to  
10 the April, 2014 CPS Discovery Responses. Aaron provided the list of questions and documents to  
11 CPS and Freeman, and also discussed it by telephone with Gordy, Freeman and CPS employee  
12 John Ballantyne, and former CPS employee Keith Goldman, in order to ensure Dentons and CPS  
13 were doing everything possible to respond to the best of CPS' knowledge, information and belief,  
14 to the April, 2014 CPS Discovery Requests and to find any additional documents that were not  
15 already part of what had been collected by Walton, Gordy, Hutton and others at CPS.

16 26. During this same period of time, and after Dentons received Plaintiff's second  
17 round of discovery, other attorneys and paralegals at Dentons were also diligently working on the  
18 discovery responses and document review and production, running searches and constructing  
19 detailed queries from among the 17,100 documents collected by Walton, Gordy, Hutton and others  
20 at CPS, to confirm documents responsive to the discovery requests were produced or were going  
21 to be produced. Dentons also performed extensive searches in the document review and  
22 production database, constructing queries, and reviewing documents to re-confirm CPS had  
23 produced documents responsive to Plaintiff's document requests.

24 27. In June, 2014, in recognition of CPS' obligations under the Federal Rules of Civil  
25 Procedure, as well as out of an abundance of caution, Dentons re-reviewed CPS' Answers to First  
26 Interrogatories, and Responses to First Request for Production of Documents, which were first  
responded to by former counsel Walton on behalf of CPS in December, 2012. It was determined

1 supplemental responses should be provided to Plaintiff, and so on June 3, 2014, CPS did serve its  
2 Amended and Supplemental Answers to Plaintiff's First Interrogatories and Amended and  
3 Supplemental Responses to Requests for Production of Documents.

4 28. Plaintiff filed a second Motion to Compel against CPS on June 19, 2014 (Dkt. 199).  
5 Although prior extensive work had been conducted to ensure documents were collected utilizing  
6 the Specified Search Terms along with the expertise of Gordy, Walton, and Hutton (*see* Hutton  
7 Decl., ¶ 6), and that the April, 2014 discovery responses were replied to and CPS responded to the  
8 best of its knowledge, information and belief, in an effort to be as diligent and responsive as  
9 possible, Dentons and CPS endeavored to re-confirm yet again, that any and all potentially  
10 responsive documents had been gathered, another look was given at the prior discovery responses,  
11 another round of additional investigations and conversations were pursued with CPS to determine  
12 if there were any additional details, responses, or documents that could be supplemented to  
Plaintiff.

13 29. In July 2014, in yet another further effort to ensure CPS had fully complied with  
14 this Court's Order (Dkt 104), as well as to endeavor to be diligent because of Plaintiff's second  
15 Motion to Compel (Dkt. 199), Aaron contacted Randy Gibson, an IT employee with CPS  
16 ("Gibson"). Aaron provided Gibson with a list of the custodians for which CPS had already  
17 delivered potentially responsive documents (*see* ¶ 8 above), and asked Gibson to re-confirm CPS  
18 had gathered all potentially responsive documents from the existing custodians or any other  
19 custodians. Gibson again conducted the searches, utilizing the Specified Search Terms on the  
20 following individuals' computers for potentially responsive data, and found no new or additional  
documents:

21 Ballantyne, John  
22 Cloutier, Christine  
23 Fletcher, Garry  
24 Freeman, Douglas  
25 Goldman, Keith  
26 Gordy, Viola Elayne  
Hamby, Ben  
Joly, Stacy  
Lin, Chan

McCord, Christopher  
Roach, Larry  
Sanchez, Leilani  
Shifflett, Liane  
Underwood, Douglas  
Walia, Paramveer  
Hyden-Berger, Dawn

Dentons has privileged emails between Aaron, and Gibson, discussing and memorializing these efforts and conversations.

30. Additionally, during that same time frame, Plaintiff requested a 30(b)(6) deposition of CPS' corporate representative, which could have covered CPS' document retention and collection policy, as well as collection efforts in this case, however, Plaintiff subsequently elected not to do so.

31. On July 21, 2014, CPS served (i) Amended Answers to Plaintiff's First Request for Production of Documents; (ii) Amended Answers to Plaintiff's Second Interrogatories; and (iii) First Amended Responses to Plaintiff's Second Request for Production of Documents, which attached a 32 page document listing and identifying bates ranges of responsive documents which had already been produced.

32. Additionally, in yet another effort to ensure CPS is in full compliance with this Court's most recent order, and to also ensure that CPS fully complies with its discovery obligations, Tyler Page, an attorney with Dentons flew to CPS' offices on December 3, 2014 to conduct, in person, another investigation into the document collection, and to physically review any paper files and documents.

33. Ms. Page determined there were 13 banker boxes of potentially responsive documents, one free standing notebook, and a two-part corporate notebook carefully retained pursuant to the CPS Litigation Hold. The boxes and free standing notebook are segregated, and have been carefully maintained, first in the office of Gordy, and then in a locked, three room records area, which requires a security badge for entry. The boxes are labeled and posted with an instructional note that no one is to touch them or get into them. Additional bankers boxes

1 containing American Express receipts, wire transfer logs, and other non-responsive CPS financial  
2 document have also been carefully maintained and preserved in a separate section of the same  
3 records area.

4 34. Ms. Page reviewed the documents in these 13 boxes, one free standing notebook,  
5 and a two-part corporate notebook and pulled potentially responsive documents. Many of the  
6 documents from the boxes have been already produced by CPS in its electronic productions, but in  
7 an effort to do everything possible to ensure Dentons and CPS are in full compliance with this  
8 Court's November 25 Order (Dkt. 272), Dentons, on behalf of CPS, is producing documents from  
9 these paper files at CPS00030089-CPS00030216.

10 35. In response to this Court's November 25, 2014 Order (Dkt. 272), with respect to  
11 Document Request number 61, in addition to producing the agreement at CPS00016010-12, CPS,  
12 Walton and Hutton applied the Specified Search Terms which would have gathered any and all  
13 documents potentially responsive to this document request, and CPS has produced all responsive,  
14 non-privileged documents. (12/12/13 Walton Conversation, Ex. 1, Hutton Decl., ¶ 6, 4/24/14  
15 Gordy Conversation. Furthermore, Dentons conducted additional searches in electronic and paper  
16 files, as described in this Declaration, and followed up with CPS to again ensure that all  
17 responsive documents have been produced).

18 36. In response to this Court's November 25, 2014 Order (Dkt. 272), with respect to  
19 Document Request number 63, after a good faith effort to search, no responsive documents have  
20 been found. (*see also* Leadpile's First Amended Objections and Responses to Plaintiff's Second  
21 Request for Production of Documents, dated July 17, 2014, Request No. 91). Further, CPS,  
22 Walton and Hutton applied the Specified Search Terms which would have gathered any and all  
23 documents potentially responsive to this document request, and CPS has produced all responsive,  
24 non-privileged documents. (12/12/13 Walton Conversation, Ex. 1, Hutton Decl., ¶ 6, 4/24/14  
25 Gordy Conversation. Furthermore, Dentons conducted additional searches in electronic and paper  
26 files, as described in this Declaration, and followed up with CPS to again ensure that all  
responsive documents have been produced).

1           37. In response to this Court's November 25, 2014 Order (Dkt. 272), with respect to  
2 Document Request number 64, on December 1, 2014, Aaron, Wolf and I spoke by telephone with  
3 Gibson. Gibson confirmed that Carey Brown did not originally, nor does he now, have a CPS  
4 email address. Gibson also confirmed that Carey Brown uses a gmail account:  
5 suburban7@gmail.com. Further, to the extent there appear to be entity email addresses associated  
6 with Carey Brown (for example, carey.brown@terenine.com), those email addresses were only set  
7 up to automatically forward received emails to Carey Brown's gmail account. Therefore, none of  
8 what seem to be company email addresses associated with Carey Brown were actually accessed or  
used by Carey Brown.

9           38. Dentons confirmed that at the time of the collection managed by Walton, Gordy  
10 and Hutton, CPS conducted manual searches from within Carey's gmail account using the  
11 Specified Search Terms. On December 1, 2014, Gibson conducted a search for the word  
12 "Leadpile" in Carey Brown's gmail account. From that search, Gibson delivered 180 emails  
13 where Carey Brown was the author and 977 emails where Carey Brown was a recipient, and  
14 which hit on the word LeadPile. Many of those documents were well-outside the responsive date  
15 range. Dentons loaded all of the documents into our document review platform.

16           39. Dentons has reviewed the documents and found 355 responsive documents which  
17 we are producing today, identified as Bates Numbered CPS00029655 - CPS00029920, an  
18 additional 1,144 pages produced on behalf of CPS. From these documents, there are 22  
19 responsive documents which CPS is withholding for privilege. A supplemental privilege log for  
the 22 documents is also being produced today, a copy of which is attached hereto as Exhibit 3.

20           40. In response to this Court's November 25, 2014 Order (Dkt. 272), with respect to  
21 Document Request number 75, CPS produced voluminous materials related to CPS' policies,  
22 procedures, and protocols regarding compliance with the TCPA. *See* Exhibit 4, attached hereto  
23 listing bates ranges of documents produced on this topic. Further, CPS, Walton and Hutton  
24 applied the Specified Search Terms which would have gathered any and all documents potentially  
25 responsive to this document request, and CPS has produced all responsive, non-privileged  
26

1 documents. (12/12/13 Walton Conversation, Ex. 1, Hutton Decl., ¶ 6, 4/24/14 Gordy  
2 Conversation. Furthermore, Dentons conducted additional searches in electronic and paper files,  
3 as described in this Declaration, and followed up with CPS to again ensure that all responsive  
4 documents have been produced).

5 41. In response to this Court's November 25, 2014 Order (Dkt. 272), with respect to  
6 Document Request number 83, CPS is producing today, documents identified as Bates Number  
7 CPS00029921-CPS00030186. (12/12/13 Walton Conversation, Ex. 1, Hutton Decl., ¶ 6, 4/24/14  
8 Gordy Conversation. Furthermore, Dentons conducted additional searches in electronic and paper  
9 files, as described in this Declaration, and followed up with CPS to again ensure that all  
10 responsive documents have been produced).

11 I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct, and that this declaration was signed on December 5, 2014 in Kansas  
13 City, Missouri.

14 DATED: December 5, 2014

/s/ Michele R. Hall

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# EXHIBIT 1

1 Steven Martin Aaron, Esq. (MO Bar No. 41653)

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13 *Attorneys for Defendant*

*CREDIT PAYMENT SERVICES, INC.*

14  
15 **IN THE UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

16 FLEMMING KRISTENSEN, individually,  
17 and on behalf of a class of similarly situated  
18 individuals,

19 Plaintiff,

v.

20 CREDIT PAYMENT SERVICES, INC.,

21 a Nevada corporation,

22 f/k/a MYCASHNOW.COM INC.,

23 ENOVA INTERNATIONAL, INC.,

an Illinois corporation,

24 PIONEER FINANCIAL SERVICES, INC.,

a Missouri corporation,

25 LEADPILE LLC,

a Delaware limited liability company, and

26 CLICKMEDIA, LLC d/b/a

27 NET1PROMOTIONS LLC, a Georgia limited

liability company,

28 Defendants.

) Case No. 2:12-CV-00528-APG (PAL)

) DECLARATION OF DAVID HUTTON

**DECLARATION OF DAVID HUTTON**

I, David Hutton, hereby aver pursuant to 28 U.S.C. § 1746 that I have personal knowledge of all matters set forth herein unless otherwise indicated, and if called upon to testify would do so as follows:

1. I am an adult over the age of 18, and a resident of the State of Tennessee.

2. I am currently employed as an attorney at Scenic City Legal Group, PC.

3. As an attorney with Scenic City Legal Group, I represented Credit Payment Service Inc., ("CPS") with respect to the above-captioned matter from its filing until October 2013.

4. Shortly after this suit was filed, I advised CPS to retain all documents and electronic information potentially relevant to this suit.

5. I also advised CPS to collect documents and electronic information potentially relevant to this suit.

6. To do this, I advised CPS to apply the search parameters and terms defined in the Court's Motion to Compel Order issued on August 27, 2013. I advised CPS to apply these terms to all CPS computers and files that may potentially contain relevant information.

7. I gave all responsive documents and electronic information that was provided to me from this search to either Timothy Walton, who was counsel for CPS at the time, or opposing counsel.

8. It is my opinion that CPS has complied with the Court Order issued on August 27, 2013.

I declare under my oath as an officer of the Court that the foregoing is true and correct to the best of my knowledge.

Date: May 15, 2015

  
David Hutton

# EXHIBIT 2

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA**  
**Kristensen v. Credit Payment Services, Inc., et al. , Case No. 2:12-CV-00528-AGP (PAL)**

**PRIVILEGE LOG OF CREDIT PAYMENT SERVICES, INC.**

See Key of privileged parties at the end

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
<b>DOCUMENTS WITHHELD FROM PRODUCTION AS FULLY PRIVILEGED</b>										
CPS_Review0001578			Atty-Client; Atty Work Prod.	Email	4/1/2013	Elayne Gordy	Amanda.Farmer@envisionmanagementgroup; Doug Freeman	Garry Fletcher		Email discussing contract language revisions from Pete Johnson, discussing advise of counsel.
CPS_Review0001579			Atty-Client; Atty Work Prod.	Email	3/25/2013	Elayne Gordy	Garry Fletcher			Email discussing contract language revisions from Pete Johnson re Cloudswell Master Services Agreement with draft agreement attached, discussing advise of counsel.
CPS_Review0001582			Atty-Client; Atty Work Prod.	Attach.	4/1/2013					Attachment to prior email - Cloudswell Master Services Agreement, red-lined
CPS_Review0001583			Atty-Client; Atty Work Prod.	Attach.	4/1/2013					Attachment to prior email - Cloudswell Master Services Agreement, clean
CPS_Review0003076			Atty-Client; Atty Work Prod.	Email	3/6/2011	Casey Lomber	Operations_cpsloans.net	Adam Wolcott; Justin Ginoza		Email discussing CPS conversion funnel for February
CPS_Review0003077			Atty-Client; Atty Work Prod.	Attach.	3/6/2011					Attachment to prior email - CPS conversion funnel for February
CPS_Review0004011			Atty-Client; Atty Work Prod.	Email	3/14/2013	John Ballantyne	Pete Johnson; SCL Legal Review	Stacy Joly; Justin Ginoza; Elayne Gordy; Doug Freeman		Email discussing policy and rules with respect to outbound call campaign for existing customers
CPS_Review0004016			Atty-Client; Atty Work Prod.	Attach.	3/14/2013					Attachment to prior email - chart
CPS_Review0004268			Atty-Client; Atty Work Prod.	Email	4/15/2013	Stacy Joly	SCL Legal Review	Elayne Gordy	Stacy Joly	Email discussing and circulating draft CPS / LeadPile Reseller Agreement for iOvation
CPS_Review0004269			Atty-Client; Atty Work Prod.	Attach.	4/15/2013					Attachment to prior email - logo .jpg
CPS_Review0004270			Atty-Client; Atty Work Prod.	Attach.	4/15/2013					Attachment to prior email - draft CPS / LeadPile Reseller Agreement for iOvation
CPS_Review0004271			Atty-Client; Atty Work Prod.	Email	4/15/2013	Stacy Joly	SCL Legal Review	Elayne Gordy		Email discussing and circulating draft CPS/LeadPile Reseller Agreement for iOvation
CPS_Review0004272			Atty-Client; Atty Work Prod.	Attach.	4/15/2013					Attachment to prior email - logo .jpg

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0004273			Atty-Client; Atty Work Prod.	Attach.	4/15/2013					Attachment to prior email - draft CPS / LeadPile Reseller Agreement for iOvation
CPS_Review0004303			Atty-Client; Atty Work Prod.	Email	3/6/2013	Stacy Joly	elayne.gordy@cpsloans.net			Email discussing and outlining Pete Johnson's review of terms, conditions, policies with respect to Twilio; received from counsel, discussing advise of counsel.
CPS_Review0004422			Atty-Client	Email	2/17/2012	Stacy Joly	Stacy Joly			Email discussing and attaching items for agenda, action items and notes for Quarterly Compliance Meeting Minutes received from counsel, discussing advise of counsel.
CPS_Review0004423			Atty-Client; Atty Work Prod.	Attach.	2/17/2012					Attachment to prior email - list of action items and notes
CPS_Review0005541			Atty-Client; Atty Work Prod.	Email	4/27/2012	Chris McCord	david.hutton@sceniccitylegalgroup.com			Email circulating and discussing SMS Questions and trigger scenarios
CPS_Review0005543			Atty-Client; Atty Work Prod.	Attach.	4/27/2012					Attachment to prior email - SMS Questions and trigger scenarios
CPS_Review0005697			Atty-Client; Atty Work Prod.	Email	12/12/2011	Lian Torralbas	Chris McCord; Leilani Sanchez; Dawn Hyde-Burger; Jessica Campbell; Jordan Vasileff; Whitney Phillips	Chris Enter; Matthew Butt; Melissa Harper; Amber Hayes		Email discussing SCLG advice as to text messaging, discussing advise of counsel.
CPS_Review0006116			Atty-Client; Atty Work Prod.	Email	11/21/2011	Elayne Gordy	Lian Torralbas; Chris McCord			Email discussing SCLG advice as to text messaging, discussing advise of counsel.
CPS_Review0006248			Atty-Client; Atty Work Prod.	Email	3/8/2010	Leilani Sanchez	Chris McCord	Casey Lomber		Email discussing project with Sprint regarding CCS notifications; discussing status of project
CPS_Review0006250			Atty-Client; Atty Work Prod.	Email	3/8/2010	Casey Lomber	Leilani Sanchez; Chris McCord			Email discussing project with Sprint regarding CCS notifications; discussing status of project
CPS_Review0006330			Atty-Client; Atty Work Prod.	Email	2/9/2009	Casey Lomber	chris.mccord@supportseven.com			Email discussing advice of counsel and draft language as to Autodialer Warning
CPS_Review0006370			Atty-Client; Atty Work Prod.	Email	10/13/2011	Chris McCord	Rona Hutchison	A203LeadGen@area203.com; Lian Torralbas		Email discussing advice of counsel and draft language as to Military Lead Redirect, discussing advise of counsel.
CPS_Review0006372			Atty-Client; Atty Work Prod.	Email	10/13/2011	Rona Hutchison	Chris McCord	A203LeadGen@area203.com; Lian Torralbas		Email discussing advice of counsel and draft language as to Military Lead Redirect, discussing advise of counsel.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0006382			Atty-Client; Atty Work Prod.	Email	10/19/2010	Tony Willingham	Casey Lomber; Chris McCord			Email discussing text marketing inquiry from vendor at CFSA show, discussing advise of counsel.
CPS_Review0006384			Atty-Client; Atty Work Prod.	Email	10/19/2010	Tony Willingham	Casey Lomber; Chris McCord			Email discussing text marketing inquiry from vendor at CFSA show, discussing advise of counsel.
CPS_Review0006386			Atty-Client; Atty Work Prod.	Email	9/27/2010	Tony Willingham	Casey Lomber; Chris McCord			Email discussing text marketing inquiry from vendor at CFSA show, discussing advise of counsel.
CPS_Review0006388			Atty-Client; Atty Work Prod.	Email	10/20/2010	Casey Lomber	Tony Willingham; Chris McCord			Email discussing text marketing inquiry from vendor at CFSA show, discussing advise of counsel.
CPS_Review0006820			Atty-Client	Email	12/12/2011	Lian Torralbas	Chris McCord; Leilani Sanchez; Dawn Hyde-Burger; Jessica Campbell; Jordan Vasileff; Whitney Phillips	Chris Enter; Matthew Butt; Melissa Harper; Amber Hayes; Elayne Gordy		Email discussing SCLG advice as to text messaging, discussing advise of counsel.
CPS_Review0006824			Atty-Client; Atty Work Prod.	Email	12/12/2011	Chris McCord	Lian Torralbas; Leilani Sanchez; Dawn Hyde-Burger; Jessica Campbell; Jordan Vasileff; Whitney Phillips	Chris Enter; Matthew Butt; Melissa Harper; Amber Hayes		Email discussing SCLG advice as to text messaging, discussing advise of counsel.
CPS_Review0007166			Atty-Client; Atty Work Prod.	Email	11/30/2011	Lian Torralbas	Dawn Hyde-Burger; Jessica Campbell	Melissa Harper; Amber Hayes; Chris McCord; Elayne Gordy		Email discussing legal advice and input regarding SMS Text Messaging, discussing advise of counsel.
CPS_Review0007790			Atty-Client; Atty Work Prod.	Email	11/17/2011	Casey Lomber	Elayne Gordy; Joanna Temple	Chris McCord		Email discussing legal advice and input regarding SMS Text Messaging
CPS_Review0008151			Atty-Client	Email	1/18/2011	Dawn Hyde-Burger	Chris McCord	Ben Hamby; Casey Lomber; Heather Parker		Email discussing legal advice and input regarding SMS Text Messaging
CPS_Review0008185			Atty-Client	Email	12/6/2010	Elayne Gordy	Heather Parker; Chris McCord	Casey Lomber; Adam Wolcott		Email discussing legal advice and input regarding senarios for SMS Text Messaging
CPS_Review0008201			Atty-Client; Atty Work Prod.	Email	11/17/2011	Elayne Gordy	Casey Lomber; Joanna Temple	Chris McCord		Email discussing legal advice and input regarding senarios for SMS Text Messaging
			Atty-Client; Atty Work Prod.							Joint Defense Agreement between counsel for Credit Payment Services, Inc., Pioneer Financial Services, Inc., LeadPile, LLC, and Enova International, Inc.
DOCUMENTS PRODUCED REDACTED DUE TO PRIVILEGE OR CONFIDENTIAL INFORMATION										

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
	CPS00006933	CPS00006967	Atty-Client	Attach.	5/21/2012					Redacted line item regarding Scenic City Legal Group.
	CPS00006971	CPS00007001	Atty-Client	Attach.	5/16/2012					Redacted line items regarding Scenic City Legal Group.
	CPS00007028	CPS00007074	Atty-Client	Attach.	6/17/2012					Redacted line items regarding Scenic City Legal Group.
	CPS00007184	CPS00007185	Atty-Client; Atty Work Prod.	Attach.	12/22/2011					Redacted line items regarding Scenic City Legal Group, and status notes by counsel.
	CPS00007200	CPS00007201	Atty-Client	Email	11/7/2011	Elayne Gordy	Chris McCord			Redacted recitation of advice of counsel Scenic City Legal Group regarding draft language
	CPS00007251	CPS00007253	Atty-Client	Email	5/31/2012	Jeremy.Davis@envisionmanagementgroup.com	Elayne Gordy; Chris McCord	Adam.Wolcott@envisionmanagementgroup.com; ohn Ballantyne		Redacted email from Elayne Gordy to Jeremy Davis, Chris McCord, Adam Wolcott, John Ballantyne re: California Customer emails, discussing advice of counsel.
	CPS00007254	CPS00007257	Atty-Client	Email	5/31/2012	Elayne Gordy	Jeremy.Davis@envisionmanagementgroup.com; Chris McCord	Adam.Wolcott@envisionmanagementgroup.com; John Ballantyne		Redacted email from Elayne Gordy to Jeremy Davis, Chris McCord, Adam Wolcott, John Ballantyne re: California Customer emails, discussing advice of counsel.
	CPS00007264	CPS00007277	Atty-Client; Atty Work Prod.	Email	12/12/2011	Chris McCord	Lian Torralbas; Leilani Sanchez; Dawn Hyde-Burger; Jessica Campbell; Jordan Vasileff; Whitney Phillips	Chris Enter; Matthew Butt; Melissa Harper; Amber Hayes; Elayne Gordy		Redacted emails between Elayne Gordy, Lian Torralbas, Casey Lomber, Joanna Temple discussing clarification on retention of records and text messages
	CPS00007341	CPS00007360	Atty-Client	Attach.	3/20/2012					Redacted line item regarding Scenic City Legal Group
<b>DOCUMENTS WITHHELD FROM PRODUCTION AS FULLY PRIVILEGED</b>										
<b>[IDENTIFYING DOCUMENTS THAT WERE SUBJECT TO CPS' RE-REVIEW OF PRIOR PRODUCED NATIVE DOCUMENTS THAT WERE THE SUBJECT OF CPS' CLAWBACK REQUEST]</b>										
CPS_Review0010932			Atty-Client	Email	5/9/2013	Ben Underwood	SCL Legal Review	Doug Freeman; John Ballantyne; Elayne Gordy; Susan Shiflett		After the date of the lawsuit, non-responsive, but previously produced; Email regarding Durbin Bill introduced 36% rate cap
CPS_Review0010935			Atty-Client	Attach.	5/9/2013					Attachment to privileged email, Durbin Bill
CPS_Review0010948			Atty-Client	Email	10/19/2011	Melissa Harper	Elayne Gordy	Casey Lomber; Lian Torralbas; Amber Hayes		Email discussing debt
CPS_Review0010950			Atty-Client	Email	10/19/2011	Melissa Harper	Elayne Gordy	Casey Lomber; Lian Torralbas; Amber Hayes		Email discussing debt
CPS_Review0010958			Atty-Client	Email	11/15/2011	Elayne Gordy	Casey Lomber			Email regarding Green Billow approval - Proposed FSC SMS Text messages



Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0010962			Atty-Client	Email	11/15/2011	Casey Lomber	Elayne Gordy			Email regarding Green Billow approval - Proposed FSC SMS Text messages
CPS_Review0010966			Atty-Client	Email	12/14/2010	Leilani Sanchez	Casey Lomber	Christine Cloutier; Elayne Gordy; Chris McCord		Email regarding Four Seasons Cash Staging
CPS_Review0010989			Atty-Client	Email	10/13/2011	Casey Lomber	Amber Hayes; Lian Torralbas; Melissa Harper	Elayne Gordy		Email regarding drafts and discussing FSC Legal Changes
CPS_Review0010990			Atty-Client	Attach.	10/13/2011					Attachment to privileged email regarding affiliate legal changes
CPS_Review0010991			Atty-Client	Attach.	10/13/2011					Attachment to privileged email regarding text links
CPS_Review0010992			Atty-Client	Attach.	10/13/2011					Attachment to privileged email regarding banner ads
CPS_Review0010993			Atty-Client	Attach.	10/13/2011					Attachment to privileged email regarding consumer site
CPS_Review0010995			Atty-Client	Attach.	10/13/2011					Attachment to privileged email regarding PPC legal changes for FSC
CPS_Review0011014			Atty-Client	Email	10/19/2011	Casey Lomber	Lian Torralbas	Joanna Temple; Elayne Gordy		Email discussing guidelines for dotcoms, with legal changes
CPS_Review0011015			Atty-Client	Attach.	10/19/2011					Attachment to privileged email regarding legal and compliance regulations with SLCG notes
CPS_Review0011019			Atty-Client	Email	5/17/2013	Elayne Gordy	carol.taylor@leadpile.net ;Amanda.Farmer@envisionmanagementgroup.com			After the date of the lawsuit, non-responsive, but previously produced; Email discussing meeting With Pete Johnson at SCLG, discussing advise of counsel.
CPS_Review0011021			Atty-Client	Email	5/17/2013	Elayne Gordy	carol.taylor@leadpile.net ;Amanda.Farmer@envisionmanagementgroup.com			After the date of the lawsuit, non-responsive, but previously produced; Email discussing meeting With Pete Johnson at SCLG, discussing advise of counsel.
CPS_Review0011026			Atty-Client	Email	12/14/2012	Elayne Gordy	Doug Freeman			After the date of the lawsuit, but previously produced - Email discussing re the SMS text lawsuit, discussing advise of counsel.
CPS_Review0011029			Atty-Client	Email	12/13/2012	Doug Freeman 2	Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing re the SMS text lawsuit, discussing advise of counsel.
CPS_Review0011032			Atty-Client	Email	12/14/2010	Elayne Gordy	Joanna Temple; Casey Lomber			Email regarding GB consumer note

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011034			Atty-Client	Email	8/20/2012	Pete Johnson	Monica Vo; SCL Legal Review	Elayne Gordy; Amanda Farmer		After the date of the lawsuit, non-responsive, but previously produced; Email discussing GLBA Policy
CPS_Review0011037			Atty-Client	Attach.	8/20/2012					Attachment to prior email regarding GLBA policy
CPS_Review0011046			Atty-Client	Email	9/4/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Google Alert - "PayDayMax"
CPS_Review0011055			Atty-Client	Email	10/26/2011	Casey Lomber	Lian Torralbas	Elayne Gordy; Joanna Temple		Email discussing guidelines for dotcoms, with legals changes
CPS_Review0011056			Atty-Client	Attach.	10/26/2011					Attachment to privileged email regarding legal and compliance regulations with SLCG notes
CPS_Review0011060			Atty-Client	Email	8/9/2011	Joanna Temple	Elayne Gordy			Email discussing draft language for vendor compliance and privacy language
CPS_Review0011063			Atty-Client	Email	8/9/2011	Elayne Gordy	Joanna Temple			Email discussing draft language for vendor compliance and privacy language
CPS_Review0011066			Atty-Client	Email	8/9/2011	Elayne Gordy	Joanna Temple			Email discussing draft language for vendor compliance and privacy language
CPS_Review0011069			Atty-Client	Email	8/9/2011	Elayne Gordy	Joanna Temple			Email discussing draft language for vendor compliance and privacy language
CPS_Review0011072			Atty-Client	Email	8/9/2011	Joanna Temple	Elayne Gordy			Email discussing draft language for vendor compliance and privacy language
CPS_Review0011075			Atty-Client	Email	2/7/2013	Jennifer Peters	Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing legal review related
CPS_Review0011079			Atty-Client	Email	7/20/2011	Joanna Temple	Doug Freeman 2; Elayne Gordy; Ben Underwood; Frank Pazera	Adam Wolcott; Russ Scudder; Kim Hawes; Ron Beaver; Adam Sragovicz		Email discussing help with ACH Federal win new banks
CPS_Review0011087			Atty-Client	Email	9/25/2012	Elayne Gordy	Dawn Hyde-Burger	Sylvia Cintron		After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship
CPS_Review0011107			Atty-Client	Email	9/26/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011110			Atty-Client	Email	9/26/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship
CPS_Review0011113			Atty-Client	Email	9/26/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship
CPS_Review0011116			Atty-Client	Email	9/25/2012	Elayne Gordy	Dawn Hyde-Burger	Sylvia Cintron		After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship, discussing advise of counsel.
CPS_Review0011118			Atty-Client	Email	9/26/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship, discussing advise of counsel.
CPS_Review0011121			Atty-Client	Email	9/25/2012	Elayne Gordy	Dawn Hyde-Burger	Sylvia Cintron		After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship, discussing advise of counsel.
CPS_Review0011123			Atty-Client	Email	9/25/2012	Sylvia Cintron	Elayne Gordy; Dawn Hyde-Burger			After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship
CPS_Review0011125			Atty-Client	Email	9/24/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, non-responsive, but previously produced; Email discussing inquiry regarding business relationship, discussing advise of counsel.
CPS_Review0011134			Atty-Client	Email	4/30/2013	Stacy Joly	Pete Johnson	SCL Legal Review; Elayne Gordy		After the date of the lawsuit, non-responsive, but previously produced; Email discussing iOvation agreement - half executed
CPS_Review0011151			Atty-Client	Email	3/21/2012	Casey Lomber	Stacy Joly	Elayne Gordy; SCL Legal Review		After the date of the lawsuit, non-responsive, but previously produced; Email discussing poaching

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011156			Atty-Client	Email	3/20/2012	Stacy Joly	Pete Johnson	Elayne Gordy; Casey Lee Lomber		After the date of the lawsuit, non-responsive, but previously produced; Email discussing poaching
CPS_Review0011159			Atty-Client	Email	3/21/2012	Stacy Joly	Casey Lee Lomber	Elayne Gordy; SCL Legal Review		After the date of the lawsuit, non-responsive, but previously produced; Email discussing poaching
CPS_Review0011167			Atty-Client; Atty Work Prod.	Email	12/17/2012	Elayne Gordy	Anthony Lopreto			After the date of the lawsuit, but previously produced - Email discussing Kristensen lawsuit
CPS_Review0011170			Atty-Client; Atty Work Prod.	Email	12/14/2012	Anthony Lopreto	Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing Kristensen lawsuit
CPS_Review0011225			Atty-Client	Email	11/21/2011	Lian Torralbas	Elayne Gordy; Chris McCord			Email discussing legal team input regarding SMS Text Messaging, discussing advise of counsel.
CPS_Review0011228			Atty-Client	Email	11/21/2011	Lian Torralbas	Elayne Gordy; Chris McCord			Email discussing legal team input regarding SMS Text Messaging, discussing advise of counsel.
CPS_Review0011231			Atty-Client	Email	11/30/2011	Lian Torralbas	Dawn Hyde-Burger; Jessica Campbell	Melissa Harper; Amber Hayes; Chris McCord; Elayne Gordy		Email discussing legal team input regarding SMS Text Messaging, discussing advise of counsel.
CPS_Review0011239			Atty-Client	Email	9/14/2012	Pete Johnson	Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Legal Review:
CPS_Review0011357			Atty-Client	Email	3/26/2012	Elayne Gordy	Casey Lee Lomber			Non-responsive, but previously produced; Email discussing legal docs for translation for Spanish offering
CPS_Review0011358			Atty-Client	Attach.	3/26/2012					Attachment to privileged email; Legal disclosures for Spanish translation
CPS_Review0011375			Atty-Client	Email	8/24/2011	Elayne Gordy	Casey Lomber; Heather Parker			Email discussing Privacy Policy
CPS_Review0011376			Atty-Client	Attach.	8/24/2011					Attachment to privileged email; OBA Self-Reg Compliance Guide - Full Text
CPS_Review0011377			Atty-Client	Attach.	8/24/2011					Attachment to privileged email; Microsoft Ad Remessaging Policy
CPS_Review0011378			Atty-Client	Attach.	8/24/2011					Attachment to privileged email; principle approved layout
CPS_Review0011379			Atty-Client	Email	11/4/2011	Casey Lomber	Dawn Hyde-Burger	Melissa Harper; Amber Hayes; Lian Torralbas; Elayne Gordy		Email discussing Privacy Policy Changes, discussing advise of counsel.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011392			Atty-Client; Atty Work Prod.	Email	8/12/2013	Dawn Hyde-Burger	Elayne Gordy			After the date of the lawsuit, non-responsive, but previously produced; Email discussing conference call, discussing advise of counsel.
CPS_Review0011415			Atty-Client	Email	2/2/2012	Casey Lomber	Monica Vo	Joanna Temple; SCL Legal Review; Elayne Gordy		Email discussing regulations questions
CPS_Review0011418			Atty-Client	Email	2/2/2012	Monica Vo	Elayne Gordy			Email discussing regulations questions, discussing advise of counsel.
CPS_Review0011419			Atty-Client	Email	2/1/2012	Monica Vo	Casey Lee Lomber	Joanna Temple; SCL Legal Review; Elayne Gordy		Email discussing regulations questions
CPS_Review0011420			Atty-Client	Email	2/1/2012	Casey Lomber	Monica Vo	Joanna Temple; SCL Legal Review; Elayne Gordy		Email discussing regulations questions
CPS_Review0011424			Atty-Client	Email	2/2/2012	Monica Vo	Casey Lee Lomber	Joanna Temple; SCL Legal Review; Elayne Gordy		Email discussing regulations questions
CPS_Review0011438			Atty-Client	Email	1/4/2011	Casey Lomber	Joanna Temple; Elayne Gordy			Email discussing SMS Marketing Consent language and other information
CPS_Review0011446			Atty-Client	Email	11/17/2011	Elayne Gordy	Casey Lomber			Email discussing SMS Marketing Consent language and other information
CPS_Review0011450			Atty-Client	Email	3/1/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011455			Atty-Client	Email	11/17/2011	Casey Lomber	Elayne Gordy; Joanna Temple	Chris McCord		Email discussing SMS Text Messaging proposed language and guidelines
CPS_Review0011459			Atty-Client	Email	2/4/2013	Pete Johnson	Jennifer Peters; Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011464			Atty-Client	Email	1/31/2013	Jennifer Peters	Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011468			Atty-Client	Email	2/4/2013	Pete Johnson	Jennifer Peters; Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011473			Atty-Client	Email	3/4/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011479			Atty-Client	Email	3/1/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011484			Atty-Client	Email	2/4/2013	Pete Johnson	Jennifer Peters; Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011489			Atty-Client	Email	3/4/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011495			Atty-Client	Email	3/1/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011500			Atty-Client	Email	3/4/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011508			Atty-Client	Email	3/1/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011513			Atty-Client	Email	3/4/2013	Pete Johnson	Elayne Gordy			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Social Media Proposed Guidance and language
CPS_Review0011530			Atty-Client	Email	3/14/2013	Elayne Gordy	Pete Johnson	SCL Legal Review		After the date of the lawsuit, non-responsive, but previously produced; Email discussing Survey questions

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011533			Atty-Client	Email	3/14/2013	Pete Johnson	Elayne Gordy	SCL Legal Review		After the date of the lawsuit, non-responsive, but previously produced; Email discussing Survey questions
CPS_Review0011537			Atty-Client	Email	1/14/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, but previously produced - Email discussing TCPA Policy
CPS_Review0011539			Atty-Client	Email	3/7/2013	Pete Johnson	Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing whether Telephone surveys are permissible.
CPS_Review0011543			Atty-Client	Email	3/7/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing whether Telephone surveys are permissible.
CPS_Review0011547			Atty-Client	Email	3/7/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing whether Telephone surveys are permissible.
CPS_Review0011551			Atty-Client	Email	3/4/2013	Jennifer Peters	Elayne Gordy; SCL Legal Review			After the date of the lawsuit, non-responsive, but previously produced; Email discussing whether Telephone surveys are permissible.
CPS_Review0011555			Atty-Client	Email	12/13/2012	Elayne Gordy	David Hutton	SCL Legal Review		After the date of the lawsuit, but previously produced - Email discussing Terenine Employees Who Dealt with SMS, regarding this lawsuit
CPS_Review0011557			Atty-Client	Email	12/13/2012	Elayne Gordy	Chris McCord			After the date of the lawsuit, but previously produced - Email discussing Terenine Employees Who Dealt with SMS, discussing advise of counsel and this lawsuit.
CPS_Review0011561			Atty-Client	Email	12/13/2012	David Hutton	Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing Terenine Employees Who Dealt with SMS, discussing advise of counsel and this lawsuit.
CPS_Review0011566			Atty-Client	Email	12/9/2011	Casey Lomber	Elayne Gordy			Email discussing exact target text messages

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011581			Atty-Client	Email	8/23/2011	Lian Torralbas	Ben Underwood	Doug Freeman; Larry Roach; Dawn Hyde-Burger; Elayne Gordy; eugen@leadpile.com Hemant Butti; Joanna Temple; Tavis Salazar		Email discussing poaching compilation
CPS_Review0011582			Atty-Client	Attach.	8/23/2011					Attachment to privileged email, FSC Site Poaching Compilation 8-23-11
CPS_Review0011583			Atty-Client	Email	8/23/2011	Ben Underwood	Doug Freeman; Tavis Salazar; Hemant Butti; Joanna Temple	Larry Roach; Dawn Hyde-Burger; Lian Torralbas; Elayne Gordy; eugen@leadpile.com		Email discussing poaching compilation
CPS_Review0011584			Atty-Client	Email	8/25/2011	Ben Underwood	Lian Torralbas	Doug Freeman; Larry Roach; Dawn Hyde-Burger; Elayne Gordy; eugen@leadpile.com; Hemant Butti; Joanna Temple; Tavis Salazar		Email discussing poaching compilation
CPS_Review0011585			Atty-Client	Attach.	8/25/2011					Attachment to privileged email, Select Complaint
CPS_Review0011686			Atty-Client	Email	12/14/2011	Elayne Gordy	Casey Lee Lomber			Email discussing updated copy guidelines document
CPS_Review0011791			Atty-Client	Email	1/25/2012	Casey Lomber	Elayne Gordy	SCL Legal Review		Non-responsive but previously produced; email discussing sites need a warning about phony debt collection
CPS_Review0011795			Atty-Client	Email	4/15/2013	Dawn Hyde-Burger	Elayne Gordy	Sylvia Cintron; Chris McCord		After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011797			Atty-Client; Atty Work Prod.	Email	4/15/2013	Elayne Gordy	Dawn Hyde-Burger	Sylvia Cintron; Chris McCord		After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011800			Atty-Client; Atty Work Prod.	Email	4/16/2013	Chris McCord	Elayne Gordy; Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011801			Atty-Client; Atty Work Prod.	Attach.	4/16/2013					Attachment to privileged email; test account receipt of text message admin site



Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011804			Atty-Client; Atty Work Prod.	Email	4/4/2013	Sylvia Cintron	Dawn Hyde-Burger; Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011806			Atty-Client; Atty Work Prod.	Email	4/4/2013	Dawn Hyde-Burger	Sylvia Cintron; Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011808			Atty-Client; Atty Work Prod.	Email	4/4/2013	Sylvia Cintron	Elayne Gordy; Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011810			Atty-Client; Atty Work Prod.	Email	4/4/2013	Dawn Hyde-Burger	Elayne Gordy; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011813			Atty-Client; Atty Work Prod.	Email	4/4/2013	Sylvia Cintron	Dawn Hyde-Burger; Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011815			Atty-Client; Atty Work Prod.	Email	4/4/2013	Dawn Hyde-Burger	Sylvia Cintron; Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011817			Atty-Client; Atty Work Prod.	Email	4/4/2013	Sylvia Cintron	Elayne Gordy; Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011819			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Dawn Hyde-Burger; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011823			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Sylvia Cintron; Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011826			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Dawn Hyde-Burger; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011829			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Dawn Hyde-Burger; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011833			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Sylvia Cintron; Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011836			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Dawn Hyde-Burger; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011839			Atty-Client; Atty Work Prod.	Email	4/4/2013	Dawn Hyde-Burger	Elayne Gordy; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011842			Atty-Client; Atty Work Prod.	Email	4/4/2013	Dawn Hyde-Burger	Sylvia Cintron	Elayne Gordy		After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0011844			Atty-Client; Atty Work Prod.	Email	3/14/2013	John Ballantyne	Pete Johnson; SCL Legal Review	Stacy Joly; Justin Ginoza; Elayne Gordy; Doug Freeman		After the date of the lawsuit, non-responsive, but previously produced; Email discussing Outbound Call Campaign for Existing Customers
CPS_Review0011848			Atty-Client	Email	3/14/2013	Elayne Gordy	Pete Johnson			After the date of the lawsuit, non-responsive, but previously produced; Email discussing Outbound Call Campaign for Existing Customers
CPS_Review0011852			Atty-Client	Email	3/13/2013	Pete Johnson	Stacy Joly; SCL Legal Review	Justin Ginoza; John Ballantyne; Elayne Gordy; Doug Freeman		After the date of the lawsuit, non-responsive, but previously produced; Email discussing Outbound Call Campaign for Existing Customers
CPS_Review0011856			Atty-Client	Email	3/14/2013	John Ballantyne	Pete Johnson; SCL Legal Review	Stacy Joly; Justin Ginoza; Elayne Gordy; Doug Freeman 2		After the date of the lawsuit, non-responsive, but previously produced; Email discussing Outbound Call Campaign for Existing Customers

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011861			Atty-Client	Attach.	3/14/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email, state volume
CPS_Review0011869			Atty-Client	Email	9/6/2012	Elayne Gordy	Garry Fletcher			After the date of the lawsuit, non-responsive, but previously produced; Email discussing vendor management policy (advice of counsel).
CPS_Review0011874			Atty-Client	Attach.	9/6/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email, vendor management policy final version
CPS_Review0011931			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	David Hutton			After the date of the lawsuit, but previously produced - Email discussing information needed for this lawsuit
CPS_Review0011963			Atty-Client	Email	8/24/2011	Casey Lomber	Elayne Gordy			Email discussing revisions to powerpoint on Compliance update
CPS_Review0011964			Atty-Client	Attach.						Attachment to privileged email, powerpoint presentation on compliance update
CPS_Review0011975			Atty-Client	Email	11/7/2011	Elayne Gordy	Casey Lomber			Email discussing separation of disclosures information for final approval
CPS_Review0011976			Atty-Client	Attach.	11/7/2011					Attachment to privileged email; proposed separation of disclosures
CPS_Review0011977			Atty-Client	Attach.	11/7/2011					Attachment to privileged email, draft Online Application New Customer
CPS_Review0011982			Atty-Client	Email	1/3/2011	Elayne Gordy	Casey Lomber	Joanna Temple		Email discussing SMS Marketing Consent language and information
CPS_Review0011983			Atty-Client	Attach.	1/3/2011					Attachment to privileged email, draft SMS Consent Language
CPS_Review0011988			Atty-Client; Atty Work Prod.	Email	12/6/2010	Elayne Gordy	Heather Parker; Chris McCord	Casey Lomber; Adam Wolcott		Email discussing SMS messaging response from legal department
CPS_Review0011993			Atty-Client	Email	11/17/2011	Elayne Gordy	Casey Lomber; Joanna Temple	Chris McCord		Email discussing SMS Text Messaging policy
CPS_Review0011999			Atty-Client; Atty Work Prod.	Email	6/3/2013	Amanda.Farmer@envisionmanagementgroup.com	Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing a draft of the Social Media Policy (advice of counsel).
CPS_Review0012003			Atty-Client; Atty Work Prod.	Attach.	6/3/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email, Social Media Policy - DRAFT (Clean)

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012004			Atty-Client; Atty Work Prod.	Attach.	6/3/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email, Social Media Policy - DRAFT (Redline with Comments)
CPS_Review0012005			Atty-Client; Atty Work Prod.	Attach.	6/3/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email, M 12-59 Report of the Acting General Counsel Concerning Social Media Cases
CPS_Review0012029			Atty-Client; Atty Work Prod.	Email	1/14/2013	Pete Johnson	Elayne Gordy	SCL Legal Review		After the date of the lawsuit, but previously produced - Email discussing legal review of TCPA Policy
CPS_Review0012032			Atty-Client; Atty Work Prod.	Email	3/13/2013	Elayne Gordy	Leeann Moore			After the date of the lawsuit, but previously produced - Email discussing telephone surveys feedback (advice of counsel).
CPS_Review0012035			Atty-Client; Atty Work Prod.	Email	3/4/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email discussing whether telephone surveys are permissible
CPS_Review0012044			Atty-Client; Atty Work Prod.	Attach.	3/4/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - CPS SMS screen shots
CPS_Review0012069			Atty-Client; Atty Work Prod.	Email	4/13/2012	David Hutton	Doug Freeman; Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing CPS Submission to the State of Tennessee Dept. of Banking - Financial Institutions Division
CPS_Review0012072			Atty-Client; Atty Work Prod.	Attach.	4/13/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email submission to Tennessee Department of Financial Institutions
CPS_Review0012075			Atty-Client; Atty Work Prod.	Attach.	6/8/2011					Attachment to privileged email - 11-28-07-New Affiliate Marketing Notices Coming in 2008
CPS_Review0012092			Atty-Client	Email	5/21/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding CPS policies for review - Info Security & Security Awareness and Training

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012093			Atty-Client; Atty Work Prod.	Attach.	5/21/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - draft CPS Information Security Policy
CPS_Review0012094			Atty-Client; Atty Work Prod.	Attach.	5/21/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Draft Security Awareness and Training Policy
CPS_Review0012246			Atty-Client	Email	6/25/2012	Elayne Gordy	David Hutton			After the date of the lawsuit, but previously produced - Updated regulations presentation
CPS_Review0012247			Atty-Client; Atty Work Prod.	Attach.	6/25/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - PowerPoint Presentation on updated regulations
CPS_Review0012253			Atty-Client; Atty Work Prod.	Email	4/15/2013	Elayne Gordy	Chris McCord Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and communications with Timothy Walton
CPS_Review0012255			Atty-Client; Atty Work Prod.	Email	4/4/2013	Elayne Gordy	Dawn Hyde-Burger; Sylvia Cintron			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and communications with Timothy Walton
CPS_Review0012285			Atty-Client; Atty Work Prod.	Email	8/23/2011	Elayne Gordy	Casey Lomber			Email discussing poaching
CPS_Review0012297			Atty-Client; Atty Work Prod.	Email	8/6/2013	Elayne Gordy	Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and communications with Timothy Walton
CPS_Review0012307			Atty-Client; Atty Work Prod.	Email	2/3/2012	Elayne Gordy	Casey Lomber			Email discussing legal opinion with respect to MediaTrust emails
CPS_Review0012308			Atty-Client; Atty Work Prod.	Attach.	2/3/2012					Attachment to privileged email - comments to Media Trust emails-compliance
CPS_Review0012309			Atty-Client; Atty Work Prod.	Attach.	2/3/2012					Attachment to privileged email - logo
CPS_Review0012327			Atty-Client; Atty Work Prod.	Email	9/21/2011	Casey Lomber	Elayne Gordy			Email discussing Online Application Process re Terms and Conditions
CPS_Review0012328			Atty-Client; Atty Work Prod.	Attach.	9/21/2011					Attachment to privileged email - Online Application New Customer

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012329			Atty-Client; Atty Work Prod.	Email	9/21/2011	Casey Lomber	Elayne Gordy			Email discussing Online Application Process re Terms and Conditions
CPS_Review0012330			Atty-Client; Atty Work Prod.	Attach.	9/21/2011					Attachment to privileged email - Online Application New Customer
CPS_Review0012335			Atty-Client; Atty Work Prod.	Email	9/21/2011	Casey Lomber	Elayne Gordy			Email discussing Online Application Process re Terms and Conditions
CPS_Review0012336			Atty-Client; Atty Work Prod.	Attach.	9/21/2011					Attachment to privileged email - Online Application New Customer
CPS_Review0012410			Atty-Client; Atty Work Prod.	Email	8/6/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email discussing a review of Cloudswell's VISR response
CPS_Review0012411			Atty-Client; Atty Work Prod.	Attach.	8/6/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Appendix A - Vendor InfoSec Requirements - redline draft
CPS_Review0012412			Atty-Client; Atty Work Prod.	Attach.	8/6/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Appendix A - Vendor InfoSec Requirements - clean copy
CPS_Review0012414			Atty-Client; Atty Work Prod.	Email	3/15/2013	Elayne Gordy	SCL Legal Review	Garry Fletcher		After the date of the lawsuit, but previously produced - Email discussing the review of a Master Services Agreement
CPS_Review0012415			Atty-Client; Atty Work Prod.	Attach.	3/15/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Master Services Agreement
CPS_Review0012450			Atty-Client; Atty Work Prod.	Email	8/25/2011	Elayne Gordy	Ron Beaver; Doug Freeman; Larry Roach; Joanna Temple; Adam Wolcott			Email discussing draft Quarterly Compliance Meeting powerpoint presentation
CPS_Review0012451			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - PowerPoint Presentation, quarterly compliance deck
CPS_Review0012452			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - Deceptive Trade Practices
CPS_Review0012454			Atty-Client; Atty Work Prod.	Email	8/25/2011	Elayne Gordy	Ron Beaver; Doug Freeman; Larry Roach; Joanna Temple; Adam Wolcott			Email discussing draft Quarterly Compliance Meeting powerpoint presentation

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012455			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - PowerPoint Presentation, quarterly compliance deck
CPS_Review0012456			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - Deceptive Trade Practices
CPS_Review0012458			Atty-Client; Atty Work Prod.	Email	8/25/2011	Elayne Gordy	Ron Beaver; Doug Freeman; Larry Roach; Joanna Temple; Adam Wolcott			Email discussing draft Quarterly Compliance Meeting powerpoint presentation
CPS_Review0012459			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - PowerPoint Presentation, quarterly compliance deck
CPS_Review0012460			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - Deceptive Trade Practices
CPS_Review0012462			Atty-Client; Atty Work Prod.	Email	8/25/2011	Elayne Gordy	Casey Lomber			Email discussing draft Quarterly Compliance Meeting powerpoint presentation
CPS_Review0012463			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - PowerPoint Presentation, quarterly compliance deck
CPS_Review0012464			Atty-Client; Atty Work Prod.	Attach.	8/25/2011					Attachment to privileged email - Deceptive Trade Practices
CPS_Review0012466			Atty-Client; Atty Work Prod.	Email	12/14/2010	Elayne Gordy	Joanna Temple	Casey Lomber		Email discussing language language for documents related to Green Billow
CPS_Review0012467			Atty-Client; Atty Work Prod.	Attach.	12/14/2010					Attachment to privileged email - logo
CPS_Review0012468			Atty-Client; Atty Work Prod.	Attach.	12/14/2010					Attachment to privileged email - Green Billow language inserts
CPS_Review0012470			Atty-Client; Atty Work Prod.	Email	5/13/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding lead gen adverse actions
CPS_Review0012473			Atty-Client; Atty Work Prod.	Email	8/12/2013	Elayne Gordy	Dawn Hyde-Burger			After the date of the lawsuit, but previously produced -email regarding discovery in this lawsuit and conversation with Timothy Walton
CPS_Review0012651			Atty-Client; Atty Work Prod.	Email	8/23/2012	Elayne Gordy	Pete Johnson; Monica Vo; SCL Legal Review	Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding Regulations
CPS_Review0012654			Atty-Client; Atty Work Prod.	Email	8/23/2012	Elayne Gordy	Pete Johnson; Monica Vo; SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Regulations
CPS_Review0012657			Atty-Client; Atty Work Prod.	Email	8/23/2012	Elayne Gordy	Pete Johnson; Monica Vo; SCL Legal Review	Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding Regulations

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012660			Atty-Client; Atty Work Prod.	Email	8/23/2012	Pete Johnson	Elayne Gordy; Monica Vo; SCL Legal Review	Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding Regulations
CPS_Review0012665			Atty-Client; Atty Work Prod.	Email	8/22/2012	Pete Johnson	Monica Vo; SCL Legal Review	Elayne Gordy		After the date of the lawsuit, but previously produced - Email regarding Regulations
CPS_Review0012680			Atty-Client; Atty Work Prod.	Email	8/31/2012	Monica Vo	Pete Johnson	SCL Legal Review; Elayne Gordy		After the date of the lawsuit, but previously produced - Email regarding Regulations
CPS_Review0012720			Atty-Client; Atty Work Prod.	Email	6/2/2011	Elayne Gordy	Rona Hutchison	Dawn Hyde-Burger		Email regarding call back email language (advice of counsel).
CPS_Review0012722			Atty-Client; Atty Work Prod.	Email	6/2/2011	Elayne Gordy	Rona Hutchison	Dawn Hyde-Burger		Email regarding call back email language (advice of counsel).
CPS_Review0012724			Atty-Client; Atty Work Prod.	Email	5/18/2011	Elayne Gordy	Joanna Temple			Email regarding call back email language (advice of counsel).
CPS_Review0012725			Atty-Client; Atty Work Prod.	Email	5/18/2011	Elayne Gordy	Joanna Temple			Email regarding call back email language (advice of counsel).
CPS_Review0012726			Atty-Client; Atty Work Prod.	Email	5/18/2011	Joanna Temple	Elayne Gordy			Email regarding call back email language (advice of counsel).
CPS_Review0012727			Atty-Client; Atty Work Prod.	Email	6/1/2011	Joanna Temple	Elayne Gordy			Email regarding call back email language (advice of counsel).
CPS_Review0012729			Atty-Client; Atty Work Prod.	Email	6/2/2011	Rona Hutchison	Elayne Gordy			Email regarding call back email language (advice of counsel).
CPS_Review0012742			Atty-Client; Atty Work Prod.	Email	9/4/2012	Elayne Gordy	Dawn Hyde-Burger	Sylvia Cintron; Michael Kinyanjui		After the date of the lawsuit, but previously produced - Email regarding call back email language (advice of counsel).
CPS_Review0012746			Atty-Client; Atty Work Prod.	Email	9/3/2012	Dawn Hyde-Burger	Elayne Gordy	Sylvia Cintron; Michael Kinyanjui		After the date of the lawsuit, but previously produced - Email regarding call back email language (advice of counsel).
CPS_Review0012749			Atty-Client; Atty Work Prod.	Email	8/10/2011	Elayne Gordy	Joanna Temple			Email regarding Casey Lomber
CPS_Review0012752			Atty-Client; Atty Work Prod.	Email	12/9/2011	Lian Torralbas	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012756			Atty-Client; Atty Work Prod.	Email	12/9/2011	Lian Torralbas	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012761			Atty-Client; Atty Work Prod.	Email	12/9/2011	Lian Torralbas	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012765			Atty-Client; Atty Work Prod.	Email	12/9/2011	Lian Torralbas	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012769			Atty-Client; Atty Work Prod.	Email	12/9/2011	Lian Torralbas	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012774			Atty-Client; Atty Work Prod.	Email	12/12/2011	Casey Lomber	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012780			Atty-Client; Atty Work Prod.	Email	12/12/2011	Elayne Gordy	Lian Torralbas			Email regarding advice from SCLG regarding text messages
CPS_Review0012784			Atty-Client; Atty Work Prod.	Email	12/9/2011	Elayne Gordy	Lian Torralbas			Email regarding advice from SCLG regarding text messages



Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012788			Atty-Client; Atty Work Prod.	Email	12/9/2011	Elayne Gordy	Lian Torralbas			Email regarding advice from SCLG regarding text messages
CPS_Review0012792			Atty-Client; Atty Work Prod.	Email	12/9/2011	Lian Torralbas	Elayne Gordy			Email regarding advice from SCLG regarding text messages
CPS_Review0012863			Atty-Client; Atty Work Prod.	Email	4/1/2013	Elayne Gordy	Amanda Farmer; Doug Freeman	Garry Fletcher		After the date of the lawsuit, but previously produced - Email regarding review of Cloudswell Master Services Agreement (advice of counsel).
CPS_Review0012864			Atty-Client; Atty Work Prod.	Email	3/25/2013	Elayne Gordy	Garry Fletcher			After the date of the lawsuit, but previously produced - Email regarding review of Cloudswell Master Services Agreement (advice of counsel).
CPS_Review0012867			Atty-Client; Atty Work Prod.	Attach.	3/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Cloudswell Master Services Agreement
CPS_Review0012868			Atty-Client; Atty Work Prod.	Attach.	3/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - SLCG comments to Cloudswell Master Services Agreement
CPS_Review0012892			Atty-Client; Atty Work Prod.	Email	4/1/2013	Elayne Gordy	Amanda Farmer; Doug Freeman	Garry Fletcher		After the date of the lawsuit, but previously produced - Email regarding review of Cloudswell Master Services Agreement (advice of counsel).
CPS_Review0012893			Atty-Client; Atty Work Prod.	Email	3/25/2013	Elayne Gordy	Garry Fletcher			After the date of the lawsuit, but previously produced - Email regarding Cloudswell Master Services Agreement (advice of counsel).
CPS_Review0012896			Atty-Client; Atty Work Prod.	Attach.	3/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Cloudswell Master Services Agreement
CPS_Review0012897			Atty-Client; Atty Work Prod.	Attach.	3/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - SLCG comments to Cloudswell Master Services Agreement
CPS_Review0012900			Atty-Client; Atty Work Prod.	Email	3/14/2013	Elayne Gordy	Leeann Moore	Brittany Lloyd		After the date of the lawsuit, but previously produced - Email regarding CPS survey questions (advice of counsel).
CPS_Review0012985			Atty-Client; Atty Work Prod.	Email	7/18/2013	Elayne Gordy	Ben Underwood	Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding do not call regulations by state (advice of counsel).

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012990			Atty-Client; Atty Work Prod.	Email	7/18/2013	Elayne Gordy	Ben Underwood; Amanda Farmer			After the date of the lawsuit, but previously produced - Email regarding do not call regulations by state (advice of counsel).
CPS_Review0012993			Atty-Client; Atty Work Prod.	Email	7/18/2013	Elayne Gordy	Ben Underwood	Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding do not call regulations by state (advice of counsel).
CPS_Review0012996			Atty-Client; Atty Work Prod.	Email	7/18/2013	Elayne Gordy	Ben Underwood; Amanda Farmer			After the date of the lawsuit, but previously produced - Email regarding do not call regulations by state (advice of counsel).
CPS_Review0012999			Atty-Client; Atty Work Prod.	Email	7/18/2013	Ben Underwood	Elayne Gordy	Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding do not call regulations by state (advice of counsel).
CPS_Review0013023			Atty-Client; Atty Work Prod.	Email	4/18/2013	Elayne Gordy	Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - discussing discovery in this lawsuit and conversation with Timothy Walton
CPS_Review0013061			Atty-Client; Atty Work Prod.	Email	8/7/2012	Elayne Gordy	Adam Wolcott; jeremy.davis@envisionmanagementgroup.com	SCL Legal Review		After the date of the lawsuit, but previously produced - Email regarding article - Sending Collection Letter 'In Care of' Debtor's Employer Violates FDCPA, Ninth Circuit Holds
CPS_Review0013125			Atty-Client; Atty Work Prod.	Email	5/22/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email discussing B2B regulations
CPS_Review0013126			Atty-Client	Attach.	5/22/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - overview of Consumer lending regulations
CPS_Review0013128			Atty-Client	Email	10/24/2011	Melissa Harper	Elayne Gordy	Casey Lomber; Lian Torralbas; Amber Hayes		Email regarding debt phone numbers
CPS_Review0013129			Atty-Client	Attach.	10/24/2011					Attachment to privileged email - campaign to track phone numbers
CPS_Review0013137			Atty-Client; Atty Work Prod.	Email	6/1/2011	Elayne Gordy	Joanna Temple			Email discussing call back email language
CPS_Review0013139			Atty-Client	Email	6/15/2011	Elayne Gordy	Rachel Fisher			Email discussing draft loan agreement with comments by counsel
CPS_Review0013141			Atty-Client; Atty Work Prod.	Email	4/30/2013	David Hutton	Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing this lawsuit.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013144			Atty-Client; Atty Work Prod.	Attach.	4/30/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - information regarding this lawsuit
CPS_Review0013150			Atty-Client; Atty Work Prod.	Email	10/22/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding cell and text consent in use by CPS clients
CPS_Review0013151			Atty-Client; Atty Work Prod.	Attach.	10/22/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0013161			Atty-Client; Atty Work Prod.	Email	12/9/2011	Elayne Gordy	Lian Torralbas			Email discussing advice from SCLG regarding text messages
CPS_Review0013170			Atty-Client; Atty Work Prod.	Email	7/11/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email discussing Clarity's response to CPS Info Sec Requirements
CPS_Review0013208			Atty-Client; Atty Work Prod.	Email	4/12/2011	Adam Sragovicz	Elayne Gordy	Casey Lomber; Joanna Temple		Email discussing compliance
CPS_Review0013218			Atty Work Prod.	Email	4/22/2013	Elayne Gordy	Susanne Myers			After the date of the lawsuit, but previously produced - Email discussing contracts between CPS and AREA203 (advice of counsel).
CPS_Review0013234			Atty-Client	Email	10/25/2012	Elayne Gordy	Adam Wolcott			After the date of the lawsuit, but previously produced - email discussing CPD Policies status (advice of counsel).
CPS_Review0013357			Atty-Client; Atty Work Prod.	Email	12/20/2011	Cheryl Bogue	Martin Webb			Email discussing customer and loan rep scripts and manuals (advice of counsel).
CPS_Review0013378			Atty-Client; Atty Work Prod.	Email	8/29/2012	Elayne Gordy	Jennifer Peters			After the date of the lawsuit, but previously produced - Email discussing GLBA policy draft
CPS_Review0013379			Atty-Client; Atty Work Prod.	Attach.	8/29/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - GLBA Policy v 1.0 Draft
CPS_Review0013385			Atty-Client; Atty Work Prod.	Email	4/22/2013	Elayne Gordy	Dawn Hyde-Burger			After the date of the lawsuit, but previously produced - Email discussing discovery in this lawsuit and conversation with Timothy Walton
CPS_Review0013425			Atty-Client	Email	4/10/2013	Ben Underwood	SCL Legal Review	Doug Freeman; John Ballantyne; Elayne Gordy; Susan Shiflett		After the date of the lawsuit, but previously produced - Email regarding Durbin Bill introduced-36% rate cap

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013438			Atty-Client	Email	4/19/2012	Elayne Gordy	Adam Wolcott	SCL Legal Review		After the date of the lawsuit, but previously produced - Email regarding article on managing TCPA risk
CPS_Review0013445			Atty-Client	Email	6/25/2012	Elayne Gordy	David Hutton			After the date of the lawsuit, but previously produced - Email regarding Federal consumer financial services regulations
CPS_Review0013463			Atty-Client	Email	2/3/2012	Monica Vo	Sam Valenzuela; Elayne Gordy	Casey Lee Lomber		Email regarding language for Compliance Meeting
CPS_Review0013468			Atty-Client	Email	6/26/2012	Elayne Gordy	David Hutton			After the date of the lawsuit, but previously produced -Email regarding logos
CPS_Review0013479			Atty-Client	Email	11/15/2011	Elayne Gordy	Casey Lomber			Email regarding Green Billow language approval regarding Proposed FSC SMS Text messages
CPS_Review0013480			Atty-Client	Attach.	11/15/2011					Attachment to privileged email - language regarding FSC SMS Text Messaging
CPS_Review0013489			Atty-Client	Email	8/27/2012	Elayne Gordy	SCL Legal Review	Amanda Farmer		After the date of the lawsuit, but previously produced - For review and comment - CPS GLBA Policy draft
CPS_Review0013490			Atty-Client	Attach.	8/27/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - GLBA Policy draft
CPS_Review0013492			Atty-Client	Email	8/27/2012	Elayne Gordy	SCL Legal Review	Amanda Farmer		After the date of the lawsuit, but previously produced - For review & comment - CPS Vendor Management Policy draft
CPS_Review0013493			Atty-Client	Attach.	8/27/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - Vendor Management Policy v 1.0 - Draft
CPS_Review0013514			Atty-Client; Atty Work Prod.	Email	8/7/2012	Pete Johnson	Adam Wolcott Elayne Gordy			After the date of the lawsuit, but previously produced - Email regarding How long to keep call recordings
CPS_Review0013519			Atty-Client; Atty Work Prod.	Email	5/29/2013	Dawn Hyde-Burger	Pete Johnson	SCL Legal Review; Elayne Gordy; John Ballantyne; Chris McCord; Susan Shiflett		After the date of the lawsuit, but previously produced - Email regarding AAN's

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013523			Atty-Client; Atty Work Prod.	Email	5/29/2013	Dawn Hyde-Burger	Brittany Lloyd; John Ballantyne; Susan Shiflett; Elayne Gordy; Chris McCord			After the date of the lawsuit, but previously produced - Email regarding AAN's (advice of counsel).
CPS_Review0013525			Atty-Client; Atty Work Prod.	Email	5/29/2013	Dawn Hyde-Burger	Brittany Lloyd; John Ballantyne; Susan Shiflett; Elayne Gordy; Chris McCord			After the date of the lawsuit, but previously produced - Email regarding AAN's (advice of counsel).
CPS_Review0013527			Atty-Client; Atty Work Prod.	Email	5/15/2012	Pete Johnson	Adam Wolcott; Elayne Gordy			After the date of the lawsuit, but previously produced - Email regarding ACA News Link: Cases Claims and Compliance News
CPS_Review0013542			Atty-Client; Atty Work Prod.	Email	1/20/2012	Elayne Gordy	Adam Wolcott	Casey Lee Lomber; Joanna Temple; Pete Johnson		Email regarding Alert: 10th Circuit: FDCA 'Communication' Must Reveal Existence of Debt
CPS_Review0013544			Atty-Client; Atty Work Prod.	Email	12/6/2012	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Alert: ALI Launches Restatement Project for Consumer Contracts
CPS_Review0013545			Atty-Client; Atty Work Prod.	Email	7/10/2012	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Alert: CFPB Adopts Privilege Waiver Rule As Originally Proposed
CPS_Review0013548			Atty-Client	Email	3/28/2012	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Alert: CFPB Rulemaking Portends Unilateral Modification of Privileges
CPS_Review0013550			Atty-Client	Email	10/4/2012	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Alert: CFPB Settlement Requires \$112.5 Million Payment by American Express
CPS_Review0013552			Atty-Client	Email	5/11/2012	Elayne Gordy	SCL Legal Review	Adam Wolcott		After the date of the lawsuit, but previously produced - Email regarding Alert: Debt Collector's Voicemail Not a 'Communication' under FDCA
CPS_Review0013553			Atty-Client	Email	10/19/2012	Elayne Gordy	SCL Legal Review	Jim Cole		After the date of the lawsuit, but previously produced - Email regarding Alert: Employers Must Update FCRA-Required Forms

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013562			Atty-Client	Email	4/9/2012	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Alert: FTC Outlines Best Practices in Final Privacy Report
CPS_Review0013564			Atty-Client; Atty Work Prod.	Email	6/18/2012	Pete Johnson				After the date of the lawsuit, but previously produced - Email regarding Alert: Online Data Seller Settles with FTC
CPS_Review0013567			Atty-Client; Atty Work Prod.	Email	9/9/2011	Ben Underwood	Joanna Temple; Elayne Gordy			Email regarding Alert: Prior Consent to Creditor/Es Cell Phone Calls Covers Debt Collector/Es Calls
CPS_Review0013571			Atty-Client	Email	2/1/2012	Elayne Gordy	Adam Wolcott	SCL Legal Review		Email regarding Alert: Tennessee Federal Court Allows FDCPA Claims Based on Documentation Challenge
CPS_Review0013572			Atty-Client	Email	3/20/2012	Elayne Gordy	SCL Legal Review			Email regarding Alert: Text Spamming by Outside Marketer Poses Risk of Vicarious Liability
CPS_Review0013573			Atty-Client	Email	3/16/2012	Elayne Gordy	SCL Legal Review			Email regarding Alert: Third Circuit Orders Arbitration of Employment Claims
CPS_Review0013574			Atty-Client	Email	3/15/2012	Elayne Gordy	SCL Legal Review			Email regarding Alert: White House Privacy Plan Includes Strong FTC Enforcement
CPS_Review0013587			Atty-Client	Email	4/20/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding CPS Incident Report - April 19
CPS_Review0013588			Atty-Client	Attach.	4/20/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0013590			Atty-Client	Email	12/12/2011	Elayne Gordy	Casey Lee Lomber			Email regarding Clarification from SCLG re: text messages
CPS_Review0013594			Atty-Client; Atty Work Prod.	Email	3/25/2013	Elayne Gordy	Garry Fletcher			After the date of the lawsuit, but previously produced - Email regarding Cloudswell MSA (advice of counsel).
CPS_Review0013597			Atty-Client; Atty Work Prod.	Attach.	3/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0013598			Atty-Client; Atty Work Prod.	Attach.	3/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0013619			Atty-Client; Atty Work Prod.	Email	12/6/2012	Elayne Gordy	David Hutton			After the date of the lawsuit, but previously produced - Email regarding Consent to receive text messages from application process

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013621			Atty-Client; Atty Work Prod.	Attach.	12/6/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - SMS Text Agreement from Application
CPS_Review0013622			Atty Work Prod.	Email	4/22/2013	Susanne Myers	KJ Minchew; Fallon Skinner	Elayne Gordy		After the date of the lawsuit, but previously produced - Email regarding Contracts between CPS & AREA203 (advice of counsel).
CPS_Review0013668			Atty-Client; Atty Work Prod.	Email	11/18/2012	Elayne Gordy	Adam Wolcott			After the date of the lawsuit, but previously produced - Email regarding CPS Response v1 Bank Questionnaire (advice of counsel).
CPS_Review0013669			Atty-Client; Atty Work Prod.	Attach.	11/18/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - Counsel approved CPS Response v1 Bank Questionnaire
CPS_Review0013671			Atty-Client; Atty Work Prod.	Attach.	11/18/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - draft CPS Response v1 Bank Questionnaire
CPS_Review0013738			Atty-Client; Atty Work Prod.	Email	12/14/2010	Joanna Temple	Casey Lomber	Elayne Gordy		Email regarding Green Billow consumer note draft language
CPS_Review0013740			Atty-Client; Atty Work Prod.	Attach.	12/14/2010					Attachment to privileged email - Green Billow inserts
CPS_Review0013741			Atty-Client; Atty Work Prod.	Attach.	12/14/2010					Attachment to privileged email - FSC Loan Agreement redacted
CPS_Review0013743			Atty-Client	Email	12/19/2011	Casey Lomber	Elayne Gordy			Email regarding Google Alert - "MyCashNow"
CPS_Review0013746			Atty-Client	Email	10/17/2011	Elayne Gordy	Rona Hutchison; Dawn Hyde-Burger			Email regarding Google Alert - "PayDayMax" (advice of counsel).
CPS_Review0013749			Atty-Client; Atty Work Prod.	Email	10/20/2011	Lian Torralbas	Casey Lomber	Elayne Gordy		Email regarding Guideline Document for DotComs, with suggested changes by legal
CPS_Review0013751			Atty-Client; Atty Work Prod.	Attach.	10/20/2011					Attachment to privileged email - Guideline Document for DotComs, with suggested changes by legal
CPS_Review0013760			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship
CPS_Review0013762			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013764			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship
CPS_Review0013766			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship
CPS_Review0013768			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship
CPS_Review0013770			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship
CPS_Review0013772			Atty-Client; Atty Work Prod.	Email	9/25/2012	Elayne Gordy	Casey Lee Lomber			After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship
CPS_Review0013774			Atty-Client; Atty Work Prod.	Email	9/25/2012	Dawn Hyde-Burger	Elayne Gordy	Sylvia Cintron		After the date of the lawsuit, but previously produced - Email regarding Inquiry regarding business relationship (advice of counsel).
CPS_Review0013846			Atty-Client; Atty Work Prod.	Email	1/16/2012	Elayne Gordy	Lian Torralbas	Sylvia Cintron		Email regarding CPS Serviced lenders affiliates
CPS_Review0013847			Atty-Client; Atty Work Prod.	Attach.	1/16/2012					Attachment to privileged email - Logo
CPS_Review0013848			Atty-Client; Atty Work Prod.	Attach.	1/16/2012					Attachment to privileged email - CPS serviced lenders most wanted affiliates
CPS_Review0013850			Atty-Client; Atty Work Prod.	Email	8/8/2013	Ben Underwood	SCL Legal Review	Susan Shiflett; Doug Freeman; John Ballantyne; Elayne Gordy		After the date of the lawsuit, but previously produced - Email regarding LST/Colton correspondence
CPS_Review0013867			Atty-Client	Email	8/8/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding media alert - article about LeadPile from timesfreepress.com
CPS_Review0013888			Atty-Client	Email	4/25/2013	Amanda Farmer	Elayne Gordy; Cyndi Ybarra; Carol Taylor			After the date of the lawsuit, but previously produced - Email regarding OLA spring show (advice of counsel).
CPS_Review0013890			Atty-Client	Attach.	4/25/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - OLA spring show presentation copy



Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013928			Atty-Client; Atty Work Prod.	Email	11/21/2011	Elayne Gordy	Melissa Harper; Lian Torralbas; Amber Hayes			Email regarding Question on SEO state regulations (advice of counsel).
CPS_Review0013932			Atty-Client; Atty Work Prod.	Email	11/21/2011	Casey Lomber	Elayne Gordy			Email regarding Question on SEO state regulations
CPS_Review0013942			Atty-Client; Atty Work Prod.	Email	6/20/2013	Amanda.Farmer@envisionmanagementgroup.com	Elayne Gordy			After the date of the lawsuit, but previously produced - Email regarding redlined policies from SCLG
CPS_Review0013943			Atty-Client; Atty Work Prod.	Attach.	6/20/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - revised Area 203 ROSCA (Redlines)
CPS_Review0013944			Atty-Client; Atty Work Prod.	Attach.	6/20/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Area 203 UDAAP(Redline.Comment)
CPS_Review0013945			Atty-Client; Atty Work Prod.	Attach.	6/20/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - CANSPAM AREA 203(Redline.Comments)
CPS_Review0013946			Atty-Client; Atty Work Prod.	Email	12/21/2011	Casey Lomber	Elayne Gordy			Email regarding requested information
CPS_Review0013955			Atty-Client; Atty Work Prod.	Email	11/21/2011	Casey Lomber	Elayne Gordy			Email regarding SMS Text Messaging going live
CPS_Review0013963			Atty-Client; Atty Work Prod.	Email	1/29/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Social Media - Proposed Guidance
CPS_Review0013965			Atty-Client; Atty Work Prod.	Email	2/5/2013	Elayne Gordy	Amanda Farme			After the date of the lawsuit, but previously produced - Email regarding Social Media - Proposed Guidance (advice of counsel).
CPS_Review0013970			Atty-Client; Atty Work Prod.	Email	3/22/2012	Elayne Gordy	Lian Torralbas	Leilani Sanchez		Email regarding spanish translations (advice of counsel).
CPS_Review0013973			Atty-Client; Atty Work Prod.	Email	12/13/2012	Elayne Gordy	David Hutton	SCL Legal Review		After the date of the lawsuit, but previously produced - Email regarding Terenine Employees Who Dealt with SMS
CPS_Review0013978			Atty-Client; Atty Work Prod.	Email	12/13/2012	Chris McCord	Elayne Gordy			After the date of the lawsuit, but previously produced - Email regarding Terenine Employees Who Dealt with SMS
CPS_Review0013987			Atty-Client; Atty Work Prod.	Email	5/16/2013	Stacy Joly	John Ballantyne	Garry Fletcher; Elayne Gordy		After the date of the lawsuit, but previously produced - Email regarding Twilio (advice of counsel).
CPS_Review0013998			Atty-Client	Email	4/6/2011	Casey Lomber	Elayne Gordy			Email regarding UK presentation material

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013999			Atty-Client	Attach.	4/6/2011					Attachment to privileged email - UK Lending Project Discussion
CPS_Review0014000			Atty-Client	Attach.	4/6/2011					Attachment to privileged email - UK profitability exercise for 3-29-2011 meeting
CPS_Review0014001			Atty-Client	Attach.	4/6/2011					Attachment to privileged email - slide re UK Profitability
CPS_Review0014010			Atty-Client; Atty Work Prod.	Email	3/18/2013	John Ballantyne	Justin Ginoza; Stacy Joly; Elayne Gordy	Doug Freeman		After the date of the lawsuit, but previously produced - Email regarding Outbound Call Campaing for Existing Customers (advice of counsel).
CPS_Review0014016			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - California Department of Corporations-Desist and Refrain Order
CPS_Review0014017			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - California Department of Corporations-Desist and Refrain Order
CPS_Review0014018			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - California Department of Corporations-Desist and Refrain Order
CPS_Review0014019			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Florida Intro summary
CPS_Review0014020			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - Florida Summary
CPS_Review0014023			Atty-Client; Atty Work Prod.	Email	3/15/2013	Elayne Gordy	Amanda Farmer			After the date of the lawsuit, but previously produced - Email regarding Outbound Call Campaing for Existing Customers (advice of counsel).
CPS_Review0014027			Atty-Client; Atty Work Prod.	Attach.	3/15/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - State Volume
CPS_Review0014029			Atty-Client; Atty Work Prod.	Email	3/15/2013	Elayne Gordy	Amanda Farmer			After the date of the lawsuit, but previously produced - Email regarding Outbound Call Campaing for Existing Customers (advice of counsel).

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0014034			Atty-Client; Atty Work Prod.	Email	3/18/2013	John Ballantyne	Justin Ginoza; Stacy Joly; Elayne Gordy			Email regarding Outbound Call Campaign for Existing Customers (advice of counsel).
CPS_Review0014035			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - NC PDL Analysis
CPS_Review0014041			Atty-Client; Atty Work Prod.	Attach.	3/18/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - TX PDL Analysis
CPS_Review0014063			Atty-Client; Atty Work Prod.	Email	2/1/2012	Monica Vo	Elayne Gordy			Email regarding Regulations questions (advice of counsel).
CPS_Review0014076			Atty-Client	Email	3/21/2012	Monica Vo	SCL Legal Review; Elayne Gordy			Email regarding Updated Draft of Advertising and Marketing Best Practices, requesting input
CPS_Review0014078			Atty-Client	Attach.	3/21/2012					Attachment to privileged email - logo
CPS_Review0014081			Atty-Client	Attach.	3/21/2012					Attachment to privileged email - Draft language
CPS_Review0014083			Atty-Client	Attach.	3/21/2012					Attachment to privileged email - redlined draft language
CPS_Review0014086			Atty-Client; Atty Work Prod.	Email	6/22/2012	Elayne Gordy	John Ballantyne			After the date of the lawsuit, but previously produced - Email regarding Max Amount Emails for Approval
CPS_Review0014092			Atty-Client	Email	8/14/2012	Monica Vo	SCL Legal Review	Elayne Gordy; Amanda Farmer		After the date of the lawsuit, but previously produced - Email regarding GLBA Policy
CPS_Review0014093			Atty-Client	Attach.						After the date of the lawsuit, but previously produced - Attachment to privileged email - GLBA policy
CPS_Review0014098			Atty-Client	Email	12/22/2011	Elayne Gordy	Casey Lee Lomber			Email regarding information circulated
CPS_Review0014099			Atty-Client	Attach.	12/22/2011					Attachment to privileged email - FSC Customer Service PPGs
CPS_Review0014100			Atty-Client	Attach.	12/22/2011					Attachment to privileged email - FSC Loan Documents since launch
CPS_Review0014101			Atty-Client	Attach.	12/22/2011					Attachment to privileged email - FSC SMS Messages
CPS_Review0014102			Atty-Client	Attach.	12/22/2011					Attachment to privileged email - Microsoft Word - FSC Email
CPS_Review0014104			Atty-Client; Atty Work Prod.	Email	12/27/2011	Casey Lomber	Elayne Gordy			Email regarding Google Alerts
CPS_Review0014107			Atty-Client; Atty Work Prod.	Email	12/27/2011	legal.team@sceniccitylegalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "DiscountAdvances"
CPS_Review0014108			Atty-Client; Atty Work Prod.	Email	12/27/2011	legal.team@sceniccitylegalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "MyCashNow"

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0014109			Atty-Client; Atty Work Prod.	Email	12/27/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "PayDayMax"
CPS_Review0014110			Atty-Client; Atty Work Prod.	Email	12/26/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "MyCashNow"
CPS_Review0014111			Atty-Client; Atty Work Prod.	Email	12/25/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "MyCashNow"
CPS_Review0014112			Atty-Client; Atty Work Prod.	Email	12/25/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "PayDayMax"
CPS_Review0014113			Atty-Client; Atty Work Prod.	Email	12/24/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "DiscountAdvances"
CPS_Review0014114			Atty-Client; Atty Work Prod.	Email	12/24/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "PayDayMax"
CPS_Review0014115			Atty-Client; Atty Work Prod.	Email	12/23/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "DiscountAdvances"
CPS_Review0014116			Atty-Client; Atty Work Prod.	Email	12/23/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "FourSeasonsCash"
CPS_Review0014117			Atty-Client; Atty Work Prod.	Email	12/23/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "MyCashNow"
CPS_Review0014118			Atty-Client; Atty Work Prod.	Email	12/22/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "FourSeasonsCash"
CPS_Review0014119			Atty-Client; Atty Work Prod.	Email	12/22/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "MyCashNow"
CPS_Review0014120			Atty-Client; Atty Work Prod.	Email	12/22/2011	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "PayDayMax"
CPS_Review0014121			Atty-Client; Atty Work Prod.	Email	1/3/2012	Casey Lomber	Ben Underwood	Elayne Gordy		Email regarding Google Alerts
CPS_Review0014124			Atty-Client; Atty Work Prod.	Email	1/2/2012	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "FourSeasonsCash"
CPS_Review0014125			Atty-Client; Atty Work Prod.	Email	1/2/2012	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "MyCashNow"
CPS_Review0014126			Atty-Client; Atty Work Prod.	Email	1/2/2012	legal.team@sceniccity legalgroup.com	Casey Lee Lomber			Email regarding Google Alert - "PayDayMax"
CPS_Review0014132			Atty-Client	Email	2/7/2013	Elayne Gordy	SCL Legal Review			After the date of the lawsuit, but previously produced - Email requesting legal input as to Review for PDM
CPS_Review0014160			Atty-Client; Atty Work Prod.	Email	9/24/2012	Casey Lomber	Elayne Gordy			After the date of the lawsuit, but previously produced - Email discussing this lawsuit and questions posed by Timothy Walton
CPS_Review0014176			Atty-Client	Email	1/8/2013	Elayne Gordy	Casey Lomber			After the date of the lawsuit, but previously produced - Email regarding bank relations questionnaire
CPS_Review0014191			Atty-Client; Atty Work Prod.	Email	12/14/2012	Elayne Gordy	David Hutton	Anthony Lopreto		After the date of the lawsuit, but previously produced - Email regarding this lawsuit

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0014193			Atty-Client; Atty Work Prod.	Email	4/30/2013	David Hutton	karl@KBInternetLaw.com Timothy Walton; Elayne Gordy	jeff@KBInternetLaw.com		After the date of the lawsuit, but previously produced - Email regarding this lawsuit
CPS_Review0014222			Atty-Client	Email	2/2/2012	Monica Vo	Casey Lee Lomber; Sam Valenzuela; Elayne Gordy			Email regarding LeadPile Compliance Review
CPS_Review0014223			Atty-Client	Attach.	2/2/2012					Attachment to privileged email - LeadPile Compliance Update
CPS_Review0014225			Atty-Client	Email	2/2/2012	Monica Vo	Casey Lee Lomber	Elayne Gordy		Email regarding LeadPile domains
CPS_Review0014226			Atty-Client	Attach.	2/2/2012					Attachment to privileged email - LeadPile Domains List 011912
CPS_Review0014260			Atty-Client; Atty Work Prod.	Email	4/9/2012	Casey Lomber	Elayne Gordy			After the date of the lawsuit, but previously produced - Legal Disclosures for translation for Spanish services
CPS_Review0014263			Atty-Client; Atty Work Prod.	Attach.	4/9/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - CPS Legal disclosures for Spanish translation
CPS_Review0014264			Atty-Client; Atty Work Prod.	Email	11/21/2011	Elayne Gordy	Lian Torralbas; Chris McCord			Email requesting legal input regarding SMS Text Messaging
CPS_Review0014268			Atty-Client	Email	12/6/2010	Elayne Gordy	Joanna Temple; Richard Pettit; Rachel Fisher			Email requesting legal input regarding SMS Text Messaging
CPS_Review0014287			Atty-Client; Atty Work Prod.	Email	10/13/2011	Melissa Harper	Elayne Gordy	Lian Torralbas; Amber Hayes		Email regarding MCN Site edits
CPS_Review0014288			Atty-Client; Atty Work Prod.	Attach.	10/13/2011					Attachment to privileged email - MCN Homepage
CPS_Review0014289			Atty-Client	Email	10/11/2011	Melissa Harper	Elayne Gordy	Casey Lomber; Lian Torralbas; Amber Hayes		Email discussing MCN Social media content (advice of counsel).
CPS_Review0014290			Atty-Client	Attach.	10/11/2011					Attachment to privileged email - MCN Facebook Static Copy
CPS_Review0014291			Atty-Client	Attach.	10/11/2011					Attachment to privileged email - MCN Twitter Static Copy
CPS_Review0014292			Atty-Client	Attach.	10/11/2011					Attachment to privileged email - Area203 Master Services Agreement
CPS_Review0014313			Atty-Client; Atty Work Prod.	Email	10/4/2012	Casey Lomber				After the date of the lawsuit, but previously produced - Monthly competitor updates for September 2012
CPS_Review0014316			Atty-Client; Atty Work Prod.	Attach.	10/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 9-30-12-state availability matrix

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0014317			Atty-Client; Atty Work Prod.	Attach.	10/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 9-30-12-maps showing state lending availability
CPS_Review0014318			Atty-Client; Atty Work Prod.	Attach.	10/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 9-30-12-competitor listing
CPS_Review0014319			Atty-Client; Atty Work Prod.	Attach.	10/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 9-30-12-competitor comparison, product offering, & lending models-revised
CPS_Review0014321			Atty-Client	Email	9/21/2011	Chris McCord	Casey Lomber	Elayne Gordy		Email regarding Woddy Stats for FSC
CPS_Review0014322			Atty-Client	Attach.	9/21/2011					Attachment to privileged email - Woddy Stats
CPS_Review0014553			Atty-Client	Email	5/12/2010	Ben Underwood	Charles Wykoff; Joanna Temple; Rachel Fisher; Richard Pettit	Ben Underwood		Email - SCLG weekly newsletter
CPS_Review0014824			Atty Work Prod.	Email	6/4/2010	Ben Underwood	Hemant Butti			Email regarding CFPA concerns from legal standpoint (advice of counsel).
CPS_Review0014910			Atty-Client	Email	6/14/2012	Ben Underwood	Elayne Gordy; SCL Legal Review	Doug Freeman; Dawn Hyde-Burger; Lian Torralbas; Sam Valenzuela; Monica Vo		After the date of the lawsuit, but previously produced - Email regarding Consumer Finance Webinar Tuesday: Compliance for Lead Providers and Purchasers
CPS_Review0014982			Atty-Client	Email	8/26/2011	Ben Underwood	Joanna Temple; Dawn Hyde-Burger; Hemant Butti; Lian Torralbas; Rona Hutchison	Larry Roach; Doug Freeman; Ron Beaver; Carey Brown Sam Valenzuela		Email regarding OLA Member Alert: Aggressive FTC Enforcement Actions
CPS_Review0015081			Atty-Client	Email	8/30/2012	Ben Underwood	David Hutton	Sam Valenzuela		After the date of the lawsuit, but previously produced - Email regarding SAFE Lending Act introduced

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0015115			Atty-Client	Email	2/3/2012	Ron Beaver	Doug Freeman; Carey Brown; Russ Scudder; Frank Pazera; Sam Valenzuela; Tom Rocca; Dave Carney; Adam Wolcott; Sherry Huff; Greg Peters; Scott Gaskill; Steve Steele; Joanna Temple	Ben Underwood		Email regarding WSJ.com - Opinion: Bashing Payday Lenders
CPS_Review0015157			Atty-Client	Email	10/26/2012	Ben Underwood	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding Discount Advances
CPS_Review0015212			Atty-Client	Email	8/17/2013	Ben Underwood	Ben Underwood, personal			After the date of the lawsuit, but previously produced - Email regarding OLA conference presentations
CPS_Review0015213			Atty-Client	Attach.	8/17/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email - OLA conference presentation slide
CPS_Review0015215			Atty-Client	Attach.	8/17/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0015217			Atty-Client	Attach.	8/17/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0015219			Atty-Client	Attach.	8/17/2013					After the date of the lawsuit, but previously produced - Attachment to privileged email -
CPS_Review0015237			Atty-Client	Email	6/21/2012	Ben Underwood	Doug Freeman	Ron Beaver; Carey Brown; SCL Legal Review; sam valenzuela; Russ Scudder; Frank Pazera		After the date of the lawsuit, but previously produced - Email regarding Member Alert: CFPB Challenge
CPS_Review0015239			Atty-Client	Email	8/8/2012	Sam Valenzuela	Ron Beaver; Doug Freeman	Joanna Temple; Ben Underwood		After the date of the lawsuit, but previously produced - Email regarding Member Alert: Merkley Bill
CPS_Review0015240			Atty-Client	Email	8/15/2012	Ron Beaver	Doug Freeman; Ben Underwood; Casey Knox			After the date of the lawsuit, but previously produced - Email regarding Member Alert: Merkley Bill (advice of counsel).

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0015426			Atty-Client	Email	8/30/2012	David Hutton	Ben Underwood	SCL Legal Review		After the date of the lawsuit, but previously produced - email discussing Merkley Bill
CPS_Review0015435			Atty-Client	Email	11/12/2012	Ben Underwood	SCL Legal Review			After the date of the lawsuit, but previously produced - Email discussing monthly competitor updates for October
CPS_Review0015446			Atty-Client	Email	12/4/2012	Ben Underwood	SCL Legal Review			After the date of the lawsuit, but previously produced - Email discussing monthly updates for November
CPS_Review0015448			Atty-Client	Attach.	12/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 11-30-12-state availability matrix
CPS_Review0015449			Atty-Client	Attach.	12/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 11-30-12-competitor listing
CPS_Review0015450			Atty-Client	Attach.	12/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 11-30-12-PDL INDUSTRY NEWS MONTHLY HIGHLIGHTS
CPS_Review0015451			Atty-Client	Attach.	12/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 12-4-12 CPS Client Produce Comparison Sheet
CPS_Review0015452			Atty-Client	Attach.	12/4/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 11-30-12-Revised Maps Showing State Lending Availability
CPS_Review0015457			Atty-Client	Email	11/5/2010	Ben Underwood	Joanna Temple			Email discussing communications
CPS_Review0015471			Atty-Client	Email	1/13/2012	Stacy Joly	Joanna Temple	Ben Underwood		After the date of the lawsuit, but previously produced - Email regarding OLA Call regarding Google AdWords policy changes
CPS_Review0015472			Atty-Client	Attach.	1/13/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - notes regarding 1-13-12 OLA Call
CPS_Review0015488			Atty-Client	Email	10/25/2011	Ben Underwood	Elayne Gordy; Joanna Temple			Email regarding OLA conference presentations
CPS_Review0015489			Atty-Client	Attach.	10/25/2011					Attachment to privileged email - OLA Conference slide
CPS_Review0015490			Atty-Client	Attach.	10/25/2011					Attachment to privileged email - Mon Callaway legal language



Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0015491			Atty-Client	Attach.	10/25/2011					Attachment to privileged email - Slide
CPS_Review0015492			Atty-Client	Attach.	10/25/2011					Attachment to privileged email - Slide
CPS_Review0015714			Atty-Client	Email	9/17/2012	Ben Underwood	SCL Legal Review			After the date of the lawsuit, but previously produced - Email regarding PDL industry news & updates
CPS_Review0015715			Atty-Client	Attach.	9/17/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 9-17-12-PDL Industry News
CPS_Review0016062			Atty-Client	Email	1/4/2012	Doug Freeman	Ben Underwood; Ron Beaver	Carey Brown; Joanna Temple; Sam Valenzuela; Frank Pazera		Email regarding Legislative Alert
CPS_Review0016063			Atty-Client	Email	1/4/2012	Ben Underwood	Ron Beaver	Doug Freeman; Carey Brown; Joanna Temple; Sam Valenzuela; Frank Pazera		Email regarding Legislative Alert
CPS_Review0016064			Atty-Client	Email	1/4/2012	Ron Beaver	Ben Underwood	Doug Freeman; Carey Brown; Joanna Temple; Sam Valenzuela; Frank Pazera		Email regarding Legislative Alert
CPS_Review0016065			Atty-Client	Email	1/4/2012	Doug Freeman	Ben Underwood			Email regarding Legislative Alert (advice of counsel).
CPS_Review0016066			Atty-Client	Email	1/4/2012	Ben Underwood	Doug Freeman; Ron Beaver	Carey Brown; Joanna Temple; Sam Valenzuela; Frank Pazera		Email regarding Legislative Alert
CPS_Review0016077				Email	6/21/2012	Doug Freeman	Ben Underwood			After the date of the lawsuit, but previously produced - Email regarding Member Alert: CFPB Challenge (advice of counsel).
CPS_Review0016079			Atty-Client	Email	8/9/2012	Ben Underwood	Sam Valenzuela			After the date of the lawsuit, but previously produced - Email regarding Member Alert: Merkley Bill (advice of counsel).
CPS_Review0016080				Email	8/9/2012	Jennifer Peters	Ron Beaver; Doug Freeman; Ben Underwood	Joanna Temple; SCL Legal Review		After the date of the lawsuit, but previously produced - Email regarding Member Alert: Merkley Bill
CPS_Review0016092			Atty-Client	Email	4/17/2011	Dawn Hyde-Burger	Ben Underwood	Melissa Braswell; Joanna Temple; Sylvia Cintron		Email regarding New FTC charges brought against online payday loan marketers

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0016199			Atty-Client	Email	8/30/2011	Lian Torralbas	Ben Underwood	Larry Roach; Doug Freeman; Ron Beaver; Carey Brown; Sam Valenzuela Joanna Temple; Dawn Hyde-Burger; Hemant Butti; Rona Hutchison		Email regarding OLA Member Alert: Aggressive FTC Enforcement Actions
CPS_Review0016380			Atty-Client	Email	8/30/2012	Ben Underwood	David Hutton	Sam Valenzuela		After the date of the lawsuit, but previously produced - Email regarding SAFE Lending Act introduced
CPS_Review0016381			Atty-Client	Attach.	8/30/2012					After the date of the lawsuit, but previously produced - Attachment to privileged email - 7-24-12 Safe Lending Act
CPS_Review0016428			Atty-Client	Email	8/25/2011	Ben Underwood	Lian Torralbas	Doug Freeman; Larry Roach; Dawn Hyde-Burger; Elayne Gordy; eugen@leadpile.com Hemant Butti; Joanna Temple; Tavis Salazar		Email regarding Final select complaint
CPS_Review0016429			Atty-Client	Attach.	8/25/2011					Attachment to privileged email - final select complaint
CPS_Review0016430			Atty-Client	Email	8/23/2011	Lian Torralbas	Ben Underwood	Doug Freeman; Larry Roach; Dawn Hyde-Burger; Elayne Gordy; eugen@leadpile.com; Hemant Butti; Joanna Temple; Tavis Salazar		Email regarding FSC site poaching compilation
CPS_Review0016431			Atty-Client	Attach.	8/23/2011					Attachment to privileged email - FSC Site Poaching Compilation 8-23-11
CPS_Review0016432			Atty-Client	Email	8/23/2011	Joanna Temple	Ben Underwood; Doug Freeman; Tavis Salazar; Hemant Butti	Larry Roach; Dawn Hyde-Burger; Lian Torralbas; Elayne Gordy; eugen@leadpile.com		Email regarding FSC site poaching compilation
CPS_Review0016434			Atty-Client	Email	8/23/2011	Ben Underwood	Doug Freeman; Tavis Salazar; Hemant Butti; Joanna Temple	Larry Roach; Dawn Hyde-Burger; Lian Torralbas; Elayne Gordy; eugen@leadpile.com		Email regarding FSC site poaching compilation

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0016435			Atty-Client	Email	8/23/2011	Dawn Hyde-Burger	Ben Underwood	Larry Roach; Lian Torralbas; Doug Freeman; Tavis Salazar; Joanna Temple; Hemant Butti; Eugen Ilie		Email regarding FSC site poaching compilation
CPS_Review0016436			Atty-Client	Email	9/7/2011	Ben Underwood	eugen@leadpile.com	Doug Freeman; Larry Roach; Elayne Gordy; Hemant Butti; Joanna Temple; Tavis Salazar; Lian Torralbas; Dawn Hyde-Burger		Email regarding poaching
CPS_Review0016527			Atty-Client	Email	2/3/2012	Doug Freeman 2	Ben Underwood; Ron Beaver; Carey Brown; Russ Scudder; Frank Pazera; Sam Valenzuela; Tom Rocca; Dave Carney; Adam Wolcott; Sherry Huff; Greg Peters; Scott Gaskill; Steve Steele; Joanna Temple	Lian Torralbas; Trevor Brooks		Email regarding FSC site poaching compilation
CPS_Review0016528			Atty-Client	Email	2/3/2012	Ben Underwood	Ron Beaver; Doug Freeman; Carey Brown; Russ Scudder; Frank Pazera; Sam Valenzuela'; Tom Rocca; Dave Carney; Adam Wolcot; Sherry Huff; Greg Peters; Scott Gaskill; Steve Steele; Joanna Temple	Lian Torralbas; Trevor Brooks		Email regarding WSJ.com Opinion Bashing Payday Lenders

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0016529			Atty-Client	Email	2/3/2012	Ron Beaver	Ben Underwood; Doug Freeman; Carey Brown; Russ Scudder; Frank Pazera; Sam Valenzuela'; Tom Rocca; Dave Carney; Adam Wolcott; Sherry Huff; Greg Peters; Scott Gaskill; Steve Steele; Joanna Temple	Lian Torralbas; Trevor Brooks		Email regarding WSJ.com - Opinion: Bashing Payday Lenders
CPS_Review0016711			Atty-Client	Email	6/13/2011	Ben Underwood	All CPS Staff	Melissa Braswell; Dawn Hyde-Burger; Hemant Butti; Joanna Temple; Monica Vo Sam Valenzuela; Adam Sragovicz		Email regarding WSJ.com - Opinion: Bashing Payday Lenders
CPS_Review0016712			Atty-Client	Email	6/13/2011	Ben Underwood	All CPS Staff	Melissa Braswell; Dawn Hyde-Burger; Hemant Butti; Joanna Temple; monica@leadpile.net; Sam Valenzuela; Adam Sragovicz		Email regarding webinar-Pros and Cons of different Corporate Structures
<b>DOCUMENTS PRODUCED REDACTED DUE TO PRIVILEGE OR CONFIDENTIAL INFORMATION</b> <b>[IDENTIFYING DOCUMENTS THAT WERE SUBJECT TO CPS' RE-REVIEW OF PRIOR PRODUCED NATIVE DOCUMENTS THAT WERE THE SUBJECT OF CPS' CLAWBACK REQUEST]</b>										
BegDocID	ProdBeg	ProdEnd	Privilege Assertion	Doc Type	Date Sent	Email From	Email To	Email CC	Email BCC	Redaction Description
CPS_Review0009982	CPS00007423	CPS00007458	Atty-Client	Attach.						Redacted privileged line items re: SLCG
CPS_Review0010021	CPS00007461	CPS00007572	Atty-Client	Attach.						Redacted privileged line items re: SLCG
CPS_Review0010022	CPS00007573	CPS00007667	Atty-Client	Attach.						Redacted privileged line items re: SLCG
CPS_Review0010025	CPS00007669	CPS00007675	Atty-Client	Attach.						Redacted privileged line items re: SLCG
CPS_Review0010035	CPS00007678	CPS00007686	Atty-Client	Attach.						Redacted privileged line items re: SLCG
CPS_Review0010083	CPS00007688	CPS00007689	Atty-Client	Email	3/20/2013	Stacy Joly	Lisa Dake			Redacted 11/13/2012 Email from Casey Lomber regarding monthly competitor updates for 10/12.
CPS_Review0010744	CPS00008261	CPS00008264	Atty-Client	Attach.						Redacting potential customer addresses, bank routing numbers and bank account numbers.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0011051	CPS00008751	CPS00008763	Atty-Client	Email	12/12/2011	Chris McCord	Lian Torralbas; Leilani Sanchez; Dawn Hyde-Burger; Jessica Campbell; Jordan Vasileff; Whitney Phillips	Chris Enter; Matthew Butt; Melissa Harper; Amber Hayes; Elayne Gordy		
CPS_Review0011387	CPS00010447	CPS00010451	Atty-Client	Email	5/14/2013	Jennifer Peters	Elayne Gordy; SCL Legal Review			Redacted privileged 5/13/2013 email threads between Elayne Gordy, and SLCG "Legal Review", and Jennifer Peters at SLCG regarding review of LeadPile review of publisher practice re: lenders sending AAn notifications to customers.
CPS_Review0011867	CPS00010884	CPS00010919	Atty-Client	Attach.						Redacted privileged line item re SLCG contract information.
CPS_Review0012046	CPS00011066	CPS00011073	Atty-Client	Email	12/9/2011	Elayne Gordy	Casey Lee Lomber			Redacted privileged 11/21-12/9/2011 Email threads between from Elayne Gordy, Casey Lomber, and Joanna Temple at SLCG seeking legal advice as to SMS usage and data records retention
CPS_Review0012204	CPS00011800	CPS00011845	Atty-Client	Attach.						Redacted privileged line items regarding SCLG contract and relationship.
CPS_Review0012210	CPS00011850	CPS00011895	Atty-Client	Attach.						Redacted privileged line items regarding SLCG contract and relationship with CPS.
CPS_Review0012213	CPS00011898	CPS00011943	Atty-Client	Attach.						Redacted privileged legal information
CPS_Review0012219	CPS00011948	CPS00011993	Atty-Client	Attach.						Redacted privileged line item regarding SLCG contract and relationship with CPS.
CPS_Review0012222	CPS00011996	CPS00012041	Atty-Client	Attach.						Redacted privileged line item regarding SLCG contract and relationship with CPS.
CPS_Review0012228	CPS00012045	CPS00012092	Atty-Client	Attach.						Redacted privileged line item regarding SLCG contract and relationship with CPS.
CPS_Review0012231	CPS00012094	CPS00012151	Atty-Client	Attach.						Redacted privileged line item regarding SLCG contract and relationship with CPS.
CPS_Review0012234	CPS00012153	CPS00012231	Atty-Client	Attach.						Redacted privileged line item regarding SCLG contract and relationship with CPS.
CPS_Review0012241	CPS00012247	CPS00012247	Atty-Client	Email	8/2/2012	Aaron Petticord	Elayne Gordy	Leeann Moore		Redacted privileged recounted communication with SCLG.
CPS_Review0012252	CPS00012316	CPS00012362	Atty-Client	Attach.						Redacted privileged line items regrding SLCG.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012257	CPS00012363	CPS00012363	Atty-Client; Atty Work Prod.	Email	7/18/2013	Elayne Gordy	Justin Ginoza			Redacted privileged advice of counsel.
CPS_Review0012338	CPS00014157	CPS00014204	Atty-Client	Attach.						Redacted privileged line item regarding legal advice
CPS_Review0012427	CPS00014412	CPS00014439	Atty-Client	Attach.						Redacted privileged communication to counsel.
CPS_Review0012429	CPS00014441	CPS00014468	Atty-Client	Attach.						Redacted privileged communication to counsel.
CPS_Review0012495	CPS00014566	CPS00014573	Atty-Client; Atty Work Prod.	Email	5/30/2013	Elayne Gordy	Brittany Lloyd; Chris McCord; Susan Shiflett; Dawn Hyde-Burger; John Ballantyne			Redacted privileged 5/29/2013 email communications between Dawn Hyde-Burger and Pete Johnson (cc Legal Review, Elayne Gordy, John Ballantyne, Chris McCord, Susan Shiflett) requesting review of language re: AAN notice forms
CPS_Review0012511	CPS00014598	CPS00014604	Atty-Client; Atty Work Prod.	Email	5/30/2013	Brittany Lloyd	Elayne Gordy; Chris McCord; Susan Shiflett; Dawn Hyde-Burger; John Ballantyne			Redacted privileged 5/29/2013 email communications between Dawn Hyde-Burger and Pete Johnson (cc Legal Review, Elayne Gordy, John Ballantyne, Chris McCord, Susan Shiflett) requesting review of language re: AAN notice forms
CPS_Review0012517	CPS00014607	CPS00014612	Atty-Client; Atty Work Prod.	Email	5/29/2013	Chris McCord	Susan Shiflett; Dawn Hyde-Burger; Brittany Lloyd; John Ballantyne; Elayne Gordy			Redacted privileged 5/29/2013 email communications between Dawn Hyde-Burger and Pete Johnson (cc Legal Review, Elayne Gordy, John Ballantyne, Chris McCord, Susan Shiflett) requesting review of language re: AAN notice forms
CPS_Review0012521	CPS00014613	CPS00014616	Atty-Client; Atty Work Prod.	Email	5/29/2013	Susan Shiflett	Dawn Hyde-Burger; Brittany Lloyd; John Ballantyne; Elayne Gordy; Chris McCord			Redacted privileged 5/29/2013 email communications between Dawn Hyde-Burger and Pete Johnson (cc Legal Review, Elayne Gordy, John Ballantyne, Chris McCord, Susan Shiflett) requesting review of language re: AAN notice forms
CPS_Review0012524	CPS00014617	CPS00014625	Atty-Client; Atty Work Prod.	Email	5/30/2013	Brittany Lloyd	Elayne Gordy; Chris McCord; Susan Shiflett; Dawn Hyde-Burger; John Ballantyne			Redacted privileged 5/29/2013 email communications between Dawn Hyde-Burger and Pete Johnson (cc Legal Review, Elayne Gordy, John Ballantyne, Chris McCord, Susan Shiflett) requesting review of language re: AAN notice forms
CPS_Review0012737	CPS00015292	CPS00015321	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged line item regarding SCLG

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0012738	CPS00015322	CPS00015336	Atty-Client	Attach.						Redacted privileged notes containing status and advice from SCLG.
CPS_Review0012797	CPS00015344	CPS00015802		Attach.						Redacted customer Social Security numbers, bank account numbers and other personal identifying information
CPS_Review0012817	CPS00015827	CPS00015869	Atty-Client	Attach.						Redacted privileged information about SCLG contract and relationship with CPS.
CPS_Review0012853	CPS00015947	CPS00015948	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged bullet points referencing SCLG
CPS_Review0012890	CPS00016049	CPS00016084	Atty-Client	Attach.						Redacted privileged "legal" section of spreadsheet.
CPS_Review0012923	CPS00016106	CPS00016111	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged bullet points mentioning SCLG
CPS_Review0012948	CPS00016145	CPS00016150	Atty-Client	Attach.						Redacted privileged line items with information about SCLG
CPS_Review0012962	CPS00016164	CPS00016166	Atty-Client; Atty Work Prod.	Email	8/3/2012	Elayne Gordy	Leeann Moore	Lian Torralbas; Matthew Butt		Redacted privileged advice of legal counsel.
CPS_Review0012964	CPS00016167	CPS00016170	Atty-Client; Atty Work Prod.	Email	8/3/2012	Leeann Moore	Elayne Gordy	Lian Torralbas; Aaron Petticord		Redacted privileged advice of counsel.
CPS_Review0013178	CPS00016872	CPS00017235		Attach.						Redacted column containing customer personal information such as social security numbers and bank accounts.
CPS_Review0013257	CPS00017631	CPS00017661	Atty-Client	Attach.						Redacted privileged SCLG line item.
CPS_Review0013264	CPS00017674	CPS00017675	Atty-Client; Atty Work Prod.	Email	6/20/2013	Elayne Gordy	Doug Freeman 2	Susanne Myers		Redacted privileged advice of counsel.
CPS_Review0013353	CPS00017827	CPS00017828	Atty-Client	Email	11/7/2011	Elayne Gordy	Chris McCord (chris.mccord@cpsloans.net)			Redacted privileged advice of counsel.
CPS_Review0013372	CPS00017857	CPS00017865	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged communications and advice of counsel.
CPS_Review0013373	CPS00017866	CPS00017925	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged information from legal counsel.
CPS_Review0013391	CPS00017949	CPS00017984	Atty-Client	Attach.						Redacted privileged information about SCLG agreement and relationship.
CPS_Review0013433	CPS00018138	CPS00018173	Atty-Client	Attach.						Redacted privileged line item regarding SCLG
CPS_Review0013658	CPS00018946	CPS00018947	Atty-Client	Email	12/28/2012	Elayne Gordy	Amanda Farmer (Amanda.Farmer@achfederal.com)			Redacted privileged information regarding counsel; and 12/28/2012 email from Elayne Gordy to SCLG re: CPS Policies for Review.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0013712	CPS00019202	CPS00019204	Atty-Client	Email	6/11/2013	Elayne Gordy	Doug Freeman 2			Redacted privileged information related to communications from counsel.
CPS_Review0013813	CPS00019542	CPS00019548	Atty-Client; Atty Work Prod.	Email	10/16/2012	Leeann Moore	Elayne Gordy	Aaron Petticord		Redacted privileged email from Elayne Gordy to Leeann Moore, Aaron Petticord, Katie Myers, Brittany Luther rearding Legal Review, reciting input from counsel.
CPS_Review0013817	CPS00019553	CPS00019559	Atty-Client; Atty Work Prod.	Email	10/16/2012	Leeann Moore	Elayne Gordy	Aaron Petticord		Redacted privileged email from Elayne Gordy to Leeann Moore, Aaron Petticord, Katie Myers, Brittany Luther rearding Legal Review, reciting input from counsel.
CPS_Review0013821	CPS00019564	CPS00019570	Atty-Client; Atty Work Prod.	Email	10/8/2012	Leeann Moore	Elayne Gordy	Aaron Petticord; Katie Myers		Redacted privileged email from Elayne Gordy to Leeann Moore, Aaron Petticord, Katie Myers, Brittany Luther rearding Legal Review, reciting input from counsel.
CPS_Review0013960	CPS00019796	CPS00019798	Atty-Client	Email	8/6/2013	Amanda Farmer	Elayne Gordy; Jeremy Davis			Redacted privileged references to SCLG.
CPS_Review0013962	CPS00019799	CPS00019804	Atty-Client	Attach.						Redacted privileged references to SCLG
CPS_Review0014004	CPS00019891	CPS00019901	Atty Work Prod.	Attach.						Redacted privileged Legal Requirements and Guidelines as to copy, advertisements, and vendors prepared by counsel for CPS.
CPS_Review0014128	CPS00020149	CPS00020158	Atty-Client; Atty Work Prod.	Email	12/12/2011	Elayne Gordy	Lian Torralbas			Redacted privileged 11/17/2011 - 12/7/2011 email threads between Elayne Gordy, Casey Lomber and Joanna Temple regarding SMS guidelines; 12/9 emails between Elayne Gordy and Lian Torralbas redacted for attorney advice discussed.
CPS_Review0014156	CPS00020265	CPS00020265		Email	10/9/2012	Elayne Gordy	Garry Fletcher			Redacted privileged communications with SCLG
CPS_Review0014158	CPS00020267	CPS00020278	Atty-Client	Attach.						Redacted privileged line items regarding SCLG.
CPS_Review0014166	CPS00020282	CPS00020307	Atty-Client	Attach.						Redacted privileged information regarding SCLG.
CPS_Review0014174	CPS00020315	CPS00020344	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged information regarding SCLG.



Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0014179	CPS00020347	CPS00020720		Attach.						Redacted column with confidential information related to customers (dates of birth, social security numbers, bank account numbers)
CPS_Review0014183	CPS00020722	CPS00020744	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged notes regarding SCLG
CPS_Review0014197	CPS00020758	CPS00020816	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged line items referring to information and communications from SCLG
CPS_Review0014200	CPS00020818	CPS00020851	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged references and notes regarding SCLG.
CPS_Review0014208	CPS00020861	CPS00020868	Atty Work Prod.	Email	10/19/2012	Elayne Gordy	Rona Hutchison; Leeann Moore	Aaron Petticord; Brittany Lloyd; Chris McCord; Sylvia Cintron; Meghan Richardson		Redacted 10/19/2012 privileged emails between Elayne Gordy and Rona Hutchison, cc'ing Leanne Moore, Aaron Petticord, Brittany Lloyd, Chris McCord, Sylvia Cintron, Meghan Richardson regarding CPS Conf Pages-Compliance update; discusses SMS messages and this litigation.
CPS_Review0014242	CPS00020920	CPS00020920	Atty-Client	Email	4/14/2011	Elayne Gordy	Beth Lance	Dawn Hyde-Burger; Jordan Lucas		Redacted reference C. Lomber visit to attorney offices.
CPS_Review0014281	CPS00020955	CPS00021328		Attach.						Redacted privileged column containing confidential customer information including social security numbers, bank accounts.
CPS_Review0014283	CPS00021329	CPS00021721		Attach.						Redacted privileged column containing confidential customer information including social security numbers, bank accounts.
CPS_Review0014306	CPS00021781	CPS00021782	Atty-Client	Attach.						Redacted privileged communications with SCLG.
CPS_Review0014309	CPS00021786	CPS00021787	Atty-Client	Attach.						Redacted privileged information from SCLG.
CPS_Review0014312	CPS00021791	CPS00021827	Atty-Client	Attach.						Redacted confidential customer information (SS#, bank account information)
CPS_Review0014378	CPS00022012	CPS00022041	Atty-Client	Attach.						Redacted customer account and bank account numbers.
CPS_Review0014421	CPS00022203	CPS00022205		Email	2/20/2013	Liane Shifflett	'Anthea Karl'			Redacted management login and password credentials.
CPS_Review0014427	CPS00022209	CPS00022214		Email	1/29/2013	Liane Shifflett	Rona Hutchison			Redacted customer account and bank account numbers.
CPS_Review0014429	CPS00022215	CPS00022218		Email	1/29/2013	Liane Shifflett	Rona Hutchison	A203LeadGen		Redacted customer account and bank account numbers.
CPS_Review0014433	CPS00022222	CPS00022228		Email	1/29/2013	Liane Shifflett	Pablo Ortiz; Rona Hutchison	A203LeadGen		Redacted customer account and bank account numbers.
CPS_Review0014437	CPS00022229	CPS00022232		Email	2/11/2013	Liane Shifflett	'Anthea Karl'			Redacted password and login credentials.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0014442	CPS00022242	CPS00022484		Attach.						Redacted customer account and bank account numbers.
CPS_Review0014459	CPS00022513	CPS00022514		Email	2/20/2013	Liane Shifflett	Keith Goldman			Redacted login and password information.
CPS_Review0014461	CPS00022515	CPS00022517		Email	2/20/2013	Liane Shifflett	Keith Goldman			Redacted login and password information.
CPS_Review0014474	CPS00022534	CPS00022539		Email	2/12/2013	Liane Shifflett	'Anthea Karl'			Redacted login and password information.
CPS_Review0014488	CPS00022571	CPS00022621	Atty-Client	Attach.						Redacted privileged reference to legal counsel.
CPS_Review0014496	CPS00022634	CPS00022636	Atty-Client	Attach.						Redacted privileged references to communications with counsel.
CPS_Review0014508	CPS00022702	CPS00022704	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged references to communications with counsel.
CPS_Review0014688	CPS00023050	CPS00023057	Atty-Client	Attach.						Redacted references to communications with counsel.
CPS_Review0014709	CPS00023116	CPS00023121		Attach.						Redacted user names and password.
CPS_Review0014752	CPS00023256	CPS00023262	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged information from to legal counsel.
CPS_Review0014757	CPS00023286	CPS00023292	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged references regarding legal counsel.
CPS_Review0014769	CPS00023321	CPS00023326		Attach.						Redacted user names and passwords
CPS_Review0014777	CPS00023391	CPS00023425	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged information related to legal counsel input.
CPS_Review0014786	CPS00023437	CPS00023442		Attach.						Redacted login and password information.
CPS_Review0014858	CPS00023755	CPS00023759	Atty-Client	Email	7/18/2013	Ben Underwood	Emily Kryman	Rona Hutchison		Redacted privileged 7/18/2013 email from Elayne Gordy to Ben Underwood and Amanda Farmer regarding do not call regulations, reciting advice of SCLG counsel.
CPS_Review0014983	CPS00023951	CPS00023954	Atty-Client	Email	8/30/2011	Rona Hutchison	Ben Underwood	Dawn Hyde-Burger		Redacted privileged 8/26/2011 email from Ben Underwood to Joanna Temple, Dawn Hyde-Burger, Hermant Butti, Lian Torralbas, Rona Hutchison, Larry Roach, Doug Freeman, Ron Beaver, Carey Brown, Sam Valenzuela discussing OLA alert regarding enforcement action.
CPS_Review0015397	CPS00024937	CPS00024959	Atty-Client; Atty Work Prod.	Attach.						Redacted privileged information about communications with counsel.
CPS_Review0015456	CPS00025130	CPS00025151	Atty-Client	Attach.						Redacted privileged information about legal counsel.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0015699	CPS00026014	CPS00026017	Atty-Client	Email	1/27/2011	Sam Valenzuela	Ben Underwood			Redacted privileged 1/13/2011 emails between from Ron Beaver to Carey Borwn, cc: Casey Lomber, Ben Underwood, Joanne Temple regarding market statistics.
CPS_Review0015885	CPS00026459	CPS00026478	Atty-Client	Attach.						Redacted privileged information about legal counsel.
CPS_Review0016083	CPS00026991	CPS00026996	Atty-Client	Email	8/17/2012	Casey Knox	Ron Beaver	Doug Freeman; Ben Underwood		Redacted privileged 8/8/12 email from Sam Valenzuela to Ron Beaver and Doug Freeman, cc: Joanna Temple discussing Merkley Bill.
CPS_Review0016200	CPS00027251	CPS00027255	Atty-Client	Email	8/30/2011	Ben Underwood(DFM)	Lian Torralbas			Redacted privileged 8/30/2011 Email from Lian Ben Underwood to Joanna Temple, Dawn Hyde-Burger, Hemant Butti, Lian Torralbas, Rona Hutchison, Lary Roach, Doug Freeman, Ron Beaver, Carey Brown, Sam Valenzuela regarding FTC enforcement actions.
CPS_Review0016274	CPS00027588	CPS00027596		Attach.						Redacted privileged information about legal counsel.
CPS_Review0016318	CPS00027827	CPS00027831	Atty-Client	Email	2/7/2011	Sam Valenzuela	Ben Underwood	Monica Vo		Redacted privileged 1/13/2011 email from Ron Beaver to Carey Brown, Casey Lomber, Ben Underwood, Joanna Temple regarding the PDL industry.
CPS_Review0016320	CPS00027832	CPS00027836	Atty-Client	Email	2/2/2011	Ben Underwood	Sam Valenzuela			Redacted privileged 1/13/2011 email from Ron Beaver to Carey Brown, Casey Lomber, Ben Underwood, Joanna Temple regarding the PDL industry.
CPS_Review0016322	CPS00027837	CPS00027840	Atty-Client	Email	2/2/2011	Sam Valenzuela	Ben Underwood			Redacted privileged 1/13/2011 email from Ron Beaver to Carey Brown, Casey Lomber, Ben Underwood, Joanna Temple regarding the PDL industry.
CPS_Review0016324	CPS00027841	CPS00027844		Email	1/27/2011	Ben Underwood	Sam Valenzuela			Redacted privileged 1/13/2011 email from Ron Beaver to Carey Brown, Casey Lomber, Ben Underwood, Joanna Temple regarding the PDL industry.

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Email BCC	Description / Redaction Description
CPS_Review0016427	CPS00028156	CPS00028160	Atty-Client	Email	9/6/2011	Dawn Hyde-Burger	Ben Underwood	Lian Torralbas		Redacted privileged 8/23/2011 Email threads between Doug Freeman to Tavis Salazar, Hemant Butti, Ben Underwood, Joanna Temple regarding Four Seasons Cash Advance poaching.
CPS_Review0016697	CPS00029094	CPS00029140	Atty-Client	Attach.						Redacted privileged information regarding legal counsel.

Dated: May 28, 2014

# EXHIBIT 3

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA**  
**Kristensen v. Credit Payment Services, Inc., et al. , Case No. 2:12-CV-00528-AGP (PAL)**

**PRIVILEGE LOG OF CREDIT PAYMENT SERVICES, INC.**

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Description / Redaction Description
<b>DOCUMENTS WITHHELD FROM PRODUCTION AS FULLY PRIVILEGED</b>									
CPS_Review0022009	N/A		Atty-Client Comm Work Product	Email	10/17/2013	Carey Brown	Brian Hinton; Kimberly Hutchinson		Email discussing legal advice in email dated 10/17/2013 from attorney David Hutton memorializing status of legal matters containing advice of counsel.
CPS_Review0022013	N/A	N/A	Atty-Client Comm Work Product	Email	10/17/2013	Carey Brown	Carey Brown		Email discussing email dated 10/17/2013 from attorney David Hutton memorializing status of legal matters containing advice of counsel.
CPS_Review0022035	N/A	N/A	Atty-Client Comm Work Product	Email	10/18/2013	Carey Brown	Ron Beaver		Email discussing email dated 10/18/2013 from attorney David Hutton memorializing status of legal matters containing advice of counsel.
CPS_Review0022039	N/A	N/A	Atty-Client Comm Work Product	Email	9/18/2013	Carey Brown	Ron Beaver		Email discussing legal advice in email dated 9/18/2013 from attorney David Hutton with legal advice regarding multiple lawsuits and other matters
CPS_Review0022104	N/A	N/A	Atty-Client Comm Work Product	Email	12/23/2010	Carey Brown	Joanna Temple		Email with legal counsel discussing legal advice regarding revised amendment to employment agreement
CPS_Review0022238	N/A	N/A	Atty-Client Comm Work Product	Email	10/23/2013	Ron Beaver	David Hutton; Carey Brown		Email with legal counsel discussing legal advice regarding lawsuit
CPS_Review0022239	N/A	N/A	Atty-Client Comm Work Product	Email	10/23/2013	David Hutton	Ron Beaver; Carey Brown		Email with legal counsel discussing legal advice regarding lawsuit
CPS_Review0022240	N/A	N/A	Atty-Client Comm Work Product	Email	10/23/2013	David Hutton	Carey Brown; Ron Beaver		Email with legal counsel discussing legal advice regarding lawsuit
CPS_Review0022241	N/A	N/A	Atty-Client Comm Work Product	Email	10/23/2013	David Hutton	Marie Diaz; Ron Beaver; Carey Brown		Email with legal counsel discussing legal advice regarding lawsuit
CPS_Review0022242	N/A	N/A	Atty-Client Comm Work Product	Email	10/18/2013	David Hutton	Ron Beaver; Carey Brown		Email with legal counsel discussing legal advice regarding lawsuit
CPS_Review0022243	N/A	N/A	Atty-Client Comm Work Product	Email	10/17/2013	David Hutton	Ron Beaver; Carey Brown		Email with legal counsel discussing legal advice regarding lawsuit

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Description / Redaction Description
CPS_Review0022244	N/A	N/A	Atty-Client Comm Work Product	Email	10/15/2013	David Hutton	Ron Beaver; Carey Brown		Email with legal counsel discussing legal advice regarding patent
CPS_Review0022249	N/A	N/A	Atty-Client Comm Work Product	Email	9/18/2013	David Hutton	Carey Brown		Email with legal counsel discussing legal advice regarding multiple lawsuits
CPS_Review0022440	N/A	N/A	Atty-Client Comm Work Product	Email	3/6/2014	Carey Brown	Carey Brown		Email discussing advice of legal counsel from email dated 3/5/14 with legal counsel discussing multiple lawsuits
CPS_Review0022442	N/A	N/A	Atty-Client Comm Work Product	Email	10/23/2013	David Hutton	Carey Brown; Ron Beaver		Email with legal counsel discussing legal advice regarding Subpoena
CPS_Review0022443	N/A	N/A	Atty-Client Comm Work Product	Email	10/18/2013	Carey Brown	Carey Brown		Email discussing 10/18/2013 email to JoAnna Temple and David Hutton discussing counsel's legal advice regarding multiple legal matters
CPS_Review0022444	N/A	N/A	Atty-Client Comm Work Product	Email	10/17/2013	Michael Legamano, Atty, DLA Piper	Carey Brown Ron Beaver		Email with legal counsel discussing legal advice regarding various legal matters
CPS_Review0022446	N/A	N/A	Atty-Client Comm Work Product	Email	9/30/2013	David Hutton	Ron Beaver; Carey Brown		Email with legal counsel discussing legal advice regarding various legal matters
CPS_Review0022691	N/A	N/A	Atty-Client Comm Work Product	Email	9/9/2012	Ron Beaver	Doug Freeman; Casey Knox; Joanna Temple; Carey Brown; Steve Steele		Email with legal counsel discussing legal advice regarding transaction negotiation
CPS_Review0022703	N/A	N/A	Atty-Client Comm Work Product	Email	9/10/2012	Doug Freeman	Ron Beaver; Casey Knox; Joanna Temple; Carey Brown; Steve Steele		Email with legal counsel discussing legal advice regarding transaction negotiation
CPS_Review0022728	N/A	N/A	Atty-Client Comm Work Product	Email	7/14/2010	Tony Willingham	Carey Brown Joanna Temple		Email with legal counsel discussing legal advice regarding corporate entity filings
<b>DOCUMENTS PRODUCED REDACTED DUE TO PRIVILEGE OR CONFIDENTIAL INFORMATION</b>									
<b>[IDENTIFYING DOCUMENTS THAT WERE SUBJECT TO CPS' RE-REVIEW OF PRIOR PRODUCED NATIVE DOCUMENTS THAT WERE THE SUBJECT OF CPS' CLAWBACK REQUEST]</b>									
BegDocID	ProdBeg	ProdEnd	Privilege Assertion	Doc Type	Date Sent	Email From	Email To	Email CC	Redaction Description
CPS_Review0022132	CPS00029834	CPS00029837	Atty-Client Comm Work Product		9/18/2013	Ron Beaver	Carey Brown		Email discussing 9/18/2013 email from attorney D. Hutton at SCLG to C. Brown with legal advice regarding all legal representation matters Hutton is assisting with.
N/A	CPS00030149	CPS00030186	N/A	Doc	N/A	N/A	N/A	N/A	Redacted Social Security Number on partnership tax filing

Doc ID	Beg Bates	End Bates	Privilege Assertion	Doc Type	Date	Email From	Email To	Email CC	Description / Redaction Description
N/A	CPS00030215	CPS00030216	Atty-Client Comm Work Product	Doc	11/30/[?]	Elayne Gordy			Redacted Privileged portions of handwritten notes discussing advice of counsel regarding TCPA regulations

**Dated: December 5, 2014**



# EXHIBIT 4

**INDEX OF DOCUMENTS PRODUCED RESPONSIVE TO DOCUMENT REQUEST  
NO. 75**

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